

Survey Report

Survey Details

Name 2015-06 IRO | IRO-006-East & IRO-009 SAR

Description

Start Date 3/16/2015

End Date 4/16/2015

Associated Ballots

Survey Questions

1. Do you agree with the recommendation regarding IRO-006-East? If not, please explain specifically what aspects of the recommendation you disagree with.

Charles Yeung - Southwest Power Pool, Inc. (RTO) - 2 - SPP

Selected Answer:

Answer Comment:

Document Name:

Likes: 0

Dislikes: 0

John Fontenot - Bryan Texas Utilities - 1 -

Selected Answer: Yes

Answer Comment:

Document Name:

Likes: 0

Dislikes: 0

Dennis Minton - Florida Keys Electric Cooperative Assoc. - 1 -

Selected Answer:

Answer Comment:

Document Name:

Likes: 0

Dislikes: 0

Kaleb Brimhall - Colorado Springs Utilities - 5 -

Selected Answer:

Answer Comment:

Document Name:

Likes: 0

Dislikes: 0

Nick Vtyurin - Manitoba Hydro - 1,3,5,6 - MRO

Selected Answer: Yes

Answer Comment:

Document Name:

Likes: 0

Dislikes: 0

Leonard Kula - Independent Electricity System Operator - 2 -

Selected Answer: No

Answer Comment:

We reiterate the following comments which were submitted in 2013 when the 5-Year Review Team's recommendations were posted for comment:

We do not agree with retiring R1 since it was added to the standard and worded that way to address a FERC directive which asked NERC to clearly include a requirement in the standard that TLR is not an effective means for mitigating IROL violation. The language "...prior to or concurrently with the initiation of the Eastern Interconnection TLR procedure (or continuing management of this procedure if already initiated)" is meant to convey the idea that TLR alone cannot and shall not be used to mitigate IROL exceedances, but can be used together with but not prior to other (presumably more effective) means.

The proposal to retire R3 also needs to be reconsidered. The need for this requirement in view of IDC's automatic generation of the actions contained in R3 was debated at length when the standard was posted for commenting and balloting in 2009. In the end, the vast majority of the industry supported the notion that such actions would be required in the event that the IDC became unavailable. Also, there was the issue with respect to who would be held responsible for communicating these actions given that it was not appropriate for the vendor of IDC to take up this responsibility and ensure the correctness of the communicated actions. We suggest the 5-Year Review Team of the SDT to consult with NERC staff (the IRO-006-5 Standard Developer) and/or the TLR SDT for further details.

Document Name:

Likes: 0

Dislikes: 0

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

Selected Answer:

Answer Comment: Not Applicable for Texas RE.

Document Name:

Likes: 0

Dislikes: 0

Terry Bilke - Midcontinent ISO, Inc. - 2 -

Selected Answer: Yes

Answer Comment:

Document Name:

Likes: 0

Dislikes: 0

Kathleen Black - DTE Energy - 3,4,5 - RFC

Selected Answer: Yes

Answer Comment:

Document Name:

Likes: 0

Dislikes: 0

John Merrell - Tacoma Public Utilities (Tacoma, WA) - 1 -

Selected Answer:

Answer Comment:

Document Name:

Likes: 0

Dislikes: 0

Michael Lowman - Duke Energy - 1,3,5,6 - FRCC,SERC,RFC

Error: Subreport could not be shown.

Selected Answer: Yes

Answer Comment:

Document Name:

Likes: 0

Dislikes: 0

Jason Smith - Southwest Power Pool, Inc. (RTO) - 2 - SPP

Error: Subreport could not be shown.

Selected Answer: Yes

Answer Comment:

The un-official comment form posted on the project page states that IRO-006-EAST R1 is to be revised under Criterion B7 of Paragraph 81 but the PRT Template form states that R1 is to be retired. We believe this to simply be an error in drafting the Comment form language and that the review template is the correct reference.

We thank the PRT for identifying the redundancy with other standards and requirements and their application of Paragraph 81 Criteria. We agree with the recommended changes developed by the PRT.

Document Name:

Likes: 0

Dislikes: 0

Lee Pedowicz - Northeast Power Coordinating Council - 10 - NPCC

Error: Subreport could not be shown.

Selected Answer: No

Answer Comment:

We do not agree with retiring R1 because it was added to the standard and worded to address a FERC directive. The directive asked NERC to clearly include a requirement in the standard that TLR is not an effective means for mitigating an IROL violation. The language "...prior to or concurrently with the initiation of the Eastern Interconnection TLR procedure (or continuing management of this procedure if already initiated)" is meant to convey the idea that TLR alone cannot and shall not be used to mitigate IROL exceedances, but can be used together with but not prior to other means. Disagree with the retirement of requirement R3 based on Paragraph 81 Criteria B1. Because the Purpose of IRO-006-East is "To provide an interconnection-wide transmission loading relief procedure (TLR) for the Eastern Interconnection that can be used to prevent and/or mitigate potential or actual System Operating Limit (SOL) and Interconnection Reliability Operating Limit (IROL) exceedances to maintain reliability of

the Bulk Electric System (BES).” it is important that the RCs communicate this information to other RCs in the Eastern Interconnection. This is administrative in nature, but it does support reliability by providing an abnormal event response procedure to all entities that might be impacted. In past discussions, the vast majority of the industry supported the notion that such actions would be required in the event that the IDC became unavailable. Also, there was the issue with respect to who would be held responsible for communicating these actions given that it was not appropriate for the vendor of IDC to take responsibility and ensure the correctness of the communicated actions. We suggest the 5-Year Review Team of the SDT to consult with NERC staff (the IRO-006-5 Standard Developer) and/or the TLR SDT discuss and take this into consideration.

Document Name:

Likes: 0

Dislikes: 0

Mike Smith - Manitoba Hydro - 1 -

Selected Answer: Yes

Answer Comment:

Document Name:

Likes: 0

Dislikes: 0

Ben Engelby - ACES Power Marketing - 6 -

Error: Subreport could not be shown.

Selected Answer: Yes

Answer Comment:

(1) While we agree with the recommendations and proposed modifications to IRO-006-EAST-1 and that IRO-006-EAST-1 R1 is redundant with IRO-009-1 R4, we have two concerns. First, we do not agree that IRO-006-EAST-1 R1 is redundant with IRO-008-1 R3 as documented in the five-year review template. Since it is redundant with another requirement this is just documentation issue that the drafting will need to address. Second, we encourage the drafting to review the proposed retirement of IRO-006-EAST-1 with FERC. As we recall, this requirement was added per a FERC directive when IRO-006 was approved.

(2) We agree that R3 is administrative documentation that meets P81 criteria. However, we encourage the drafting team to retain this documentation in the technical or application guidelines. It is helpful for those that do not use the IDC every day to understand how it works.

Document Name:

Likes: 0

Dislikes: 0

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

Error: Subreport could not be shown.

Selected Answer: Yes

Answer Comment:

NOTE: IESO supports and joins these SRC comments generally, but does not support the retirement of Requirements R1 – R3. MISO and CAISO do not join these SRC comments.

Document Name:

Likes: 0

Dislikes: 0

2. Do you agree with the recommendation regarding IRO-009-1? If not, please explain specifically what aspects of the recommendation you disagree with.

Charles Yeung - Southwest Power Pool, Inc. (RTO) - 2 - SPP

Selected Answer:

Answer Comment:

Document Name:

Likes: 0

Dislikes: 0

John Fontenot - Bryan Texas Utilities - 1 -

Selected Answer: Yes

Answer Comment:

Document Name:

Likes: 0

Dislikes: 0

Dennis Minton - Florida Keys Electric Cooperative Assoc. - 1 -

Selected Answer:

Answer Comment:

Document Name:

Likes: 0

Dislikes: 0

Kaleb Brimhall - Colorado Springs Utilities - 5 -

Selected Answer:

Answer Comment:

Document Name:

Likes: 0

Dislikes: 0

Nick Vtyurin - Manitoba Hydro - 1,3,5,6 - MRO

Selected Answer: Yes

Answer Comment:

Document Name:

Likes: 0

Dislikes: 0

Leonard Kula - Independent Electricity System Operator - 2 -

Selected Answer: Yes

Answer Comment:

As indicated in our comments submitted during the posting of the 5-Year Review Team's recommendations in 2013, the proposal to remove "without delay" from R4 needs to be carefully considered. There was a lengthy debate on this during the posting and balloting of the previous version of this standard. The decision to leave this in the requirement was based primarily on concerns expressed by the regulatory authorities that, without such wording, Responsible Entities could delay taking actions until closer to the end of the Tv period. This would not drive the right behavior to mitigate IROL exceedances as soon as practicable. Please consult FERC staff and the NERC facilitator (Standard Developer) for the project and/or the Reliability Coordination SDT.

Document Name:

Likes: 0

Dislikes: 0

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

Selected Answer: Yes

Answer Comment:

Document Name:

Likes: 0

Dislikes: 0

Terry Bilke - Midcontinent ISO, Inc. - 2 -

Selected Answer: Yes

Answer Comment:

Document Name:

Likes: 0

Dislikes: 0

Kathleen Black - DTE Energy - 3,4,5 - RFC

Selected Answer: Yes

Answer Comment:

Document Name:

Likes: 0

Dislikes: 0

John Merrell - Tacoma Public Utilities (Tacoma, WA) - 1 -

Selected Answer:

Answer Comment:

Tacoma Power suggests that the Measures section be consistent. Measures M1 and M3 include language that refers to corresponding requirements. For example, Measure M1 includes "...in accordance with Requirement R1"; Measure M3 includes "...in accordance with Requirement R3". Measures M2 and M4, however, do not include references to their applicable requirements.

Document Name:

Likes: 0

Dislikes: 0

Michael Lowman - Duke Energy - 1,3,5,6 - FRCC,SERC,RFC

Error: Subreport could not be shown.

Selected Answer: Yes

Answer Comment:

Duke Energy suggests the following modification to R4:

“When mitigating the magnitude and duration of an IROL, and unanimity cannot be reached, each Reliability Coordinator that monitors that Facility (or group of Facilities) shall use the most limiting of the values under consideration.”

We believe this allows Requirement 4 to be a stand-alone requirement and would not have to refer to other requirements for interpretation.

Document Name:

Likes: 0

Dislikes: 0

Jason Smith - Southwest Power Pool, Inc. (RTO) - 2 - SPP

Error: Subreport could not be shown.

Selected Answer: Yes

Answer Comment:

We agree the revisions in IRO-009-1 improve the clarity of the Standard overall and provide a valid correction to the VSL on R3 regarding the five-minute timeframe.

Document Name:

Likes: 0

Dislikes: 0

Lee Pedowicz - Northeast Power Coordinating Council - 10 - NPCC

Error: Subreport could not be shown.

Selected Answer: No

Answer Comment:

The posted IRO-009 redline is not an accurate reflection of the changes being considered in the standard. It does not show requirement R2 being revised to be Part 1.2, and it does not show requirement R5 being deleted. Standard format does not have Parts of requirements identified with "R"s.

It is not necessary to add Parts 1.1 and 1.2 (shown as R1.1 and R1.2). Requirement R1 wording can be revised to "...that can be implemented in time to prevent to prevent exceeding each of the identified IROL Tv."

In requirement R4, suggest revising the wording to "...immediately use the most limiting of the values under consideration to minimize the impact on reliability."

As indicated in comments submitted during the posting of the 5-Year Review Team's recommendations in 2013, the proposal to remove "without delay" from R4 needs to be carefully considered. There was a lengthy debate on this during the posting and balloting of the previous version of this standard. The decision to leave this in the requirement was based primarily on concerns

expressed by the regulatory authorities that, without such wording, Responsible Entities could delay taking actions until closer to the end of the Tv period. This would not drive the right behavior to mitigate IROL exceedances as soon as practicable.

Document Name:

Likes: 0

Dislikes: 0

Mike Smith - Manitoba Hydro - 1 -

Selected Answer: Yes

Answer Comment:

Document Name:

Likes: 0

Dislikes: 0

Ben Engelby - ACES Power Marketing - 6 -

Error: Subreport could not be shown.

Selected Answer: Yes

Answer Comment:

(1) R1 should be modified to use the approved format for NERC standards. Standards should use numbered lists or bullets in place of sub-requirements.

Document Name:

Likes: 0

Dislikes: 0

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

Error: Subreport could not be shown.

Selected Answer: Yes

Answer Comment:

The SRC suggests that the recommendations are appropriate, but has concerns regarding the potential redlines provided. More specifically, the SRC suggests that:

- Different interpretations regarding “expected” versus “actual” system conditions have been observed throughout the time period for which IRO-009 has been effective. Consistent definitions between the “expected” versus “actual” system conditions would be valuable to the reliability of the BES and would help to ensure that the data gathered for metrics related to IROL exceedances remains effective, accurate, and indicative of the impact of IROL exceedances on the BES. The SDT should evaluate how these terms can be

clarified.

- Terms such as “use” introduce ambiguity and should be evaluated for a determination of whether a more defined, specific action is expected and/or can be articulated.
- The SDT should evaluate and revise the replaced requirement numbers as necessary to ensure accurate mapping between new and retired requirements. In particular, the SRC has identified two potential issues:
 - R1.2 is a replacement for the old Requirement R2 (not a replacement for the incorrectly referenced R 1.1 which did not exist).
 - The comment form states that Requirements R1, R4, and R5 are to be revised, but, in the redline, there is no Requirement R5.
- The SRC suggests that the phrase "each of the identified IROLs such that each IROL...", which was added to Requirement R2 is redundant and should be revised to state “the identified IROL such that it...” More specifically, because Requirement R1 starts with the phrase "For each IROL....," which phrase already limits the sub requirements to a single identified IROL.
- The SRC cannot support the proposal to remove “without delay” from R4. There was a lengthy debate on the use of this term previously and the decision to leave this in the requirement was based on concerns (particularly of the regulatory authorities) that, without such wording, Responsible Entities could delay taking actions until closer to the end of the Tv period. This would not drive the right behavior to mitigate IROL exceedances as soon as practicable.

NOTE: MISO and CAISO do not join these SRC comments.

Document Name:

Likes: 0

Dislikes: 0

3. If you have any other comments on the Five-Year Review Recommendation that you have not already mentioned

above, please provide them here:

Charles Yeung - Southwest Power Pool, Inc. (RTO) - 2 - SPP

Selected Answer:

Answer Comment:

Document Name:

Likes: 0

Dislikes: 0

John Fontenot - Bryan Texas Utilities - 1 -

Selected Answer:

Answer Comment:

Document Name:

Likes: 0

Dislikes: 0

Dennis Minton - Florida Keys Electric Cooperative Assoc. - 1 -

Selected Answer:

Answer Comment:

Document Name:

Likes: 0

Dislikes: 0

Kaleb Brimhall - Colorado Springs Utilities - 5 -

Selected Answer:

Answer Comment:

Document Name:

Likes: 0

Dislikes: 0

Nick Vtyurin - Manitoba Hydro - 1,3,5,6 - MRO

Selected Answer:

Answer Comment:

Document Name:

Likes: 0

Dislikes: 0

Leonard Kula - Independent Electricity System Operator - 2 -

Selected Answer:

Answer Comment:

Document Name:

Likes: 0

Dislikes: 0

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

Selected Answer:

Answer Comment:

Texas RE noticed IRO-009-2 references an IROL Violation Report in EOP-004-1, which is retired. The form changed to an Event Reporting Form in EOP-004-2. Texas RE recommends the SDT change IRO-009-2 to reference the Event

Reporting Form in EOP-004-2.

Document Name:

Likes: 0

Dislikes: 0

Terry Bilke - Midcontinent ISO, Inc. - 2 -

Selected Answer:

Answer Comment:

Document Name:

Likes: 0

Dislikes: 0

Kathleen Black - DTE Energy - 3,4,5 - RFC

Selected Answer:

Answer Comment:

Document Name:

Likes: 0

Dislikes: 0

John Merrell - Tacoma Public Utilities (Tacoma, WA) - 1 -

Selected Answer:

Answer Comment:

Document Name:

Likes: 0

Dislikes: 0

Michael Lowman - Duke Energy - 1,3,5,6 - FRCC,SERC,RFC

Error: Subreport could not be shown.

Selected Answer:

Answer Comment:

Document Name:

Likes: 0

Dislikes: 0

Jason Smith - Southwest Power Pool, Inc. (RTO) - 2 - SPP

Error: Subreport could not be shown.

Selected Answer:

Answer Comment:

Document Name:

Likes: 0

Dislikes: 0

Lee Pedowicz - Northeast Power Coordinating Council - 10 - NPCC

Error: Subreport could not be shown.

Selected Answer:

Answer Comment:

Document Name:

Likes: 0

Dislikes: 0

Mike Smith - Manitoba Hydro - 1 -

Selected Answer:

Answer Comment:

Document Name:

Likes: 0

Dislikes: 0

Ben Engelby - ACES Power Marketing - 6 -

Error: Subreport could not be shown.

Selected Answer:

Answer Comment:

Document Name:

Likes: 0

Dislikes: 0

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

Error: Subreport could not be shown.

Selected Answer:

Answer Comment:

Recommendations for consideration are: • Modify the requirements to improve its clarity and measurability while removing ambiguity.

NOTE: MISO and CAISO do not join these SRC comments.

Document Name:

Likes: 0

Dislikes: 0