



September 10, 2009

VIA ELECTRONIC FILING

Kirsten Walli, Board Secretary
Ontario Energy Board
P.O Box 2319
2300 Yonge Street
Toronto, Ontario, Canada
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Re: *North American Electric Reliability Corporation*

Dear Ms. Walli:

The North American Electric Reliability Corporation (“NERC”) hereby submits this filing seeking approval of errata changes to three Reliability Standards. The proposed revisions do not change the scope or intent of the associated standard and do not have a material impact on the end users of the standard. These errors are discrepancies identified after the standards were initially submitted.

These standards, with the errata changes, have been reviewed by stakeholders and were approved by the NERC Standards Committee¹ on April 15, 2009.² The proposed Reliability Standards, contained in **Exhibit A** to this petition, are:

- **IRO-006-4.1** — Reliability Coordination — Transmission Loading Relief (TLR)

¹ Note that errata was approved for another standard, TPL-006-0. That standard is not included in this petition for approval.

² On October 29, 2008, the NERC Board of Trustees gave blanket approval to any errata changes that go through the errata process and are approved by the Standards Committee.

- **MOD-021-0.1** — Documentation of the Accounting Methodology for the Effects of Controllable Demand-Side Management in Demand and Energy Forecasts
- **PER-001-0.1** — Operating Personnel Responsibility and Authority

In accordance with the NERC Standards Committee's Procedure for Approving Errata in an Approved Reliability Standard, included in this filing as **Exhibit B**, the associated standards have been corrected and posted with a new version number. To reflect these errata changes, the version numbers of the standards proposed have been updated by adding a decimal point and the numeral "1" after the decimal point, reflecting the first such errata change.

NERC requests that these proposed Reliability Standards be made effective immediately upon approval. Upon approval, these standards will supersede the existing versions of the standards.

Because these changes will have no effect on Violation Risk Factors assigned or under development for these standards, NERC utilizes Violation Risk Factors and Violation Severity Levels for these proposed Reliability Standards that have already been submitted for the existing versions of the corrected standards.

NERC's petition consists the following:

- This transmittal letter;
- A table of contents for the entire petition;
- Errata Changes to Reliability Standards Proposed for Approval (**Exhibit A**);
- NERC Standards Committee Errata Procedure (**Exhibit B**); and
- Comments Received to the Errata Posting (**Exhibit C**).

Please contact the undersigned if you have any questions.

Respectfully submitted,

/s/ Rebecca J. Michael

Rebecca J. Michael

*Attorney for North American Electric
Reliability Corporation*

**BEFORE THE
ONTARIO ENERGY BOARD
OF THE PROVINCE OF ONTARIO**

**NORTH AMERICAN ELECTRIC)
RELIABILITY CORPORATION)**

**PETITION OF THE
NORTH AMERICAN ELECTRIC RELIABILITY CORPORATION
FOR APPROVAL OF ERRATA CHANGES TO THREE RELIABILITY
STANDARDS**

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Exhibit A — Errata Changes to Reliability Standards Proposed for Approval

Exhibit B — NERC Standards Committee Errata Procedure

Exhibit C — Comments Received to the Errata Posting

I. INTRODUCTION

The North American Electric Reliability Corporation (“NERC”) hereby requests approval of errata changes to three Reliability Standards.¹ These standards are:

- **IRO-006-4.1** — Reliability Coordination — Transmission Loading Relief (TLR)
- **MOD-021-0.1** — Documentation of the Accounting Methodology for the Effects of Controllable Demand-Side Management in Demand and Energy Forecasts
- **PER-001-0.1** — Operating Personnel Responsibility and Authority

Because correction of these errata does not substantively change the content or intent of the existing Reliability Standards, NERC developed the proposed Reliability Standards using an errata approval process developed by its Standards Committee rather than pursuing approval through the use of the *Reliability Standard Development Procedure, Version 6.1*, set forth in Appendix 3A to the NERC Rules of Procedure.

In accordance with the NERC Standards Committee’s approved procedure for processing errata, these proposed revisions were posted for industry review. No substantive issues were identified and the errata were subsequently approved by the Standards Committee on April 15, 2009.²

NERC requests approval of these proposed Reliability Standards, to be made effective immediately. **Exhibit A** to this filing sets forth the three proposed Reliability Standards. **Exhibit B** contains the NERC Standards Committee Errata Approval Procedure. This procedure is included for informational purposes only and NERC is not requesting approval of this procedure. **Exhibit C** contains the comments received and

¹ Note that the Board also approved errata for another standard, TPL-006-0. That standard is not included in this petition for approval.

² On October 29, 2008, the NERC Board of Trustees gave blanket approval to any errata changes that go through the errata process and are approved by the Standards Committee.

the response to those comments associated with the industry posting of the errata changes identified in **Exhibit A**.

NERC filed these errata changes with the Federal Energy Regulatory Commission (“FERC”), and also is filing these errata changes to the specified Reliability Standards with the other applicable governmental authorities in Canada.

II. NOTICES AND COMMUNICATIONS

Notices and communications with respect to this filing may be addressed to the following:

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III. BACKGROUND

Each of the proposed Reliability Standards set out in **Exhibit A** was initially developed and approved by industry stakeholders using NERC’s *Reliability Standards Development Procedure*. Subsequent to the filing of those Reliability Standards with this governmental authority, NERC identified what it considers to be a number of errata type modifications. The NERC Standards Committee developed and approved a process, contained in **Exhibit B** to this filing, to administer the processing of errata changes to

NERC standards. In the view of the Committee, errata can be a misspelled word, an incorrect reference to a requirement or measure, or an error, such as a missing word, *etc.*, that, when added or corrected, does not change the scope or technical content of the standard.

When notified of a proposed errata modification, the NERC Standards Committee determines if the proposed modification qualifies as errata, that is the change is a misspelled word, an incorrect reference to a requirement or measure, or an error, such as a missing word, *etc.*, that, when added or corrected, does not change the scope or technical content of the standard. The errata changes are presented for industry notice and comment for a thirty day comment period to validate that the proposed errata changes do not materially change the standard or requirements therein. The Standards Committee responds to the comments received³ and decides whether the proposed errata change should be approved. By action of the NERC Board of Trustees on October 29, 2008, any errata so approved by the Standards Committee are considered approved by the NERC Board of Trustees. With the implementation of this process, standards errata approved by the Standards Committee are now subsequently reported to the Board of Trustees for informational purposes. Each of the errata changes noted in this filing was processed in accordance with this procedure, including a 30-day comment period from February 2, 2009 through March 2, 2009, and the errata were approved the Standards Committee on April 15, 2009.

³ As demonstrated in Exhibit C of this filing, all commenters, but one, agreed that the noted errors in the Reliability Standards presented are errata. One commenter indicated disagreement with the correction to IRO-006-4; however, the reason given does not indicate disagreement with the change being “errata,” but rather with the concept of including an internet link in a standard.

The proposed changes will have no effect on Violation Risk Factors or Violation Severity Levels assigned or under development for these standards. The affected standards and basis for the proposed errata changes are identified below in redline and strikeout format:

IRO-006-4 — Reliability Coordination — Transmission Loading Relief (TLR)

Requirement R1.2. references the wrong document as shown below:

- R1.2.** The Interconnection-wide transmission loading relief procedure for use in the Western Interconnection is the WECC Unscheduled Flow Reduction Procedure provided at:
http://www.wecc.biz/documents/library/UFAS/UFAS_mitigation_plan_rev_2001-clean_8-8-03.pdf.

Previously, the linked referred the user to WECC's approved regional reliability standard, WECC-IRO-STD-006-0, provided at:
ftp://www.nerc.com/pub/sys/all_updl/standards/rrs/IRO-STD-006-0_17Jan07.pdf.

MOD-021-0 — Documentation of the Accounting Methodology for the Effects of Controllable Demand-Side Management in Demand and Energy Forecasts

Requirement R1. is missing a comma after the term, "Load-serving Entity" as shown below:

- R1:** The Load-Serving Entity, Transmission Planner and Resource Planner's forecasts shall each clearly document how the Demand and energy effects of DSM programs (such as conservation, time-of-use rates, interruptible Demands, and Direct Control Load Management) are addressed."

PER-001-0 — Operating Personnel Responsibility and Authority

Measure M1.1 uses the word, "position" rather than the word, "job" as shown below:

- M1.1** A written current job description that states in clear and unambiguous language the responsibilities and authorities of each operating position of a Transmission Operator and Balancing Authority. The ~~position~~ job description identifies personnel subject to the authority of the Transmission Operator and Balancing Authority.

In addition, NERC notes its standard version approach recognizes standard errata changes. When a NERC Reliability Standard requires errata changes, NERC will not change the original version number *per se*. Rather, NERC will add a supplemental version mechanism to supplement the current version that takes the form of a “.1” for the first errata change, “.2” for the second, and so on. For example, for the original version of Reliability Standard PER-001-0, the first errata change has been designated as PER-001-0.1. In this regard, NERC respectfully requests approval of the numeric designation of the revised standards proposed in this filing.

IV. CONCLUSION

NERC requests approval of the three modified Reliability Standards contained in this filing, effective immediately upon approval, as set out in **Exhibit A**.

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Exhibit A

Errata Changes to Reliability Standards Proposed for Approval

A. Introduction

1. **Title:** Reliability Coordination — Transmission Loading Relief (TLR)
2. **Number:** IRO-006-4.1
3. **Purpose:** The purpose of this standard is to provide Interconnection-wide transmission loading relief procedures that can be used to prevent or manage potential or actual SOL and IROL violations to maintain reliability of the Bulk Electric System.
4. **Applicability:**
 - 4.1. Reliability Coordinators.
 - 4.2. Transmission Operators.
 - 4.3. Balancing Authorities.
5. **Proposed Effective Date:** First day of first quarter after BOT adoption.

B. Requirements

R1. A Reliability Coordinator experiencing a potential or actual SOL or IROL violation within its Reliability Coordinator Area shall, with its authority and at its discretion, select one or more procedures to provide transmission loading relief. These procedures can be a “local” (regional, interregional, or sub-regional) transmission loading relief procedure or one of the following Interconnection-wide procedures: [*Violation Risk Factor: Medium*] [*Time Horizon: Real-time Operations*]

This requirement simply states; the RC has the authority to act, the RC should know at what limits he/she needs to act, the RC has pre-identified regional, interregional and sub-regional TLR procedures.

R1.1. The Interconnection-wide Transmission Loading Relief (TLR) procedure for use in the Eastern Interconnection provided in Attachment 1-IRO-006-4. The TLR procedure alone is an inappropriate and ineffective tool to mitigate an IROL violation due to the time required to implement the procedure. Other acceptable and more effective procedures to mitigate actual IROL violations include: reconfiguration, redispatch, or load shedding.

Comment: see FERC Order 693 paragraph 964 regarding recommendation for using tools other than TLR to mitigate an actual IROL.

R1.2. The Interconnection-wide transmission loading relief procedure for use in the Western Interconnection is the WECC Unscheduled Flow Reduction Procedure provided at:
http://www.wecc.biz/documents/library/UFAS/UFAS_mitigation_plan_rev_2001-clean_8-8-03.pdf.

R1.3. The Interconnection-wide transmission loading relief procedure for use in ERCOT is provided as Section 7 of the ERCOT Protocols, posted at:
<http://www.ercot.com/mktrules/protocols/current.html>

Note: the URL has changed.

- R2.** The Reliability Coordinator shall only use local transmission loading relief or congestion management procedures to which the Transmission Operator experiencing the potential or actual SOL or IROL violation is a party. [*Violation Risk Factor: Low*] [*Time Horizon: Operations Planning*]
- R3.** Each Reliability Coordinator with a relief obligation from an Interconnection-wide procedure shall follow the curtailments as directed by the Interconnection-wide procedure. A Reliability Coordinator desiring to use a local procedure as a substitute for curtailments as directed by the Interconnection-wide procedure shall obtain prior approval of the local procedure from the ERO. [*Violation Risk Factor: Low*] [*Time Horizon: Operations Planning*]
- R4.** When Interconnection-wide procedures are implemented to curtail Interchange Transactions that cross an Interconnection boundary, each Reliability Coordinator shall comply with the provisions of the Interconnection-wide procedure. [*Violation Risk Factor: Medium*] [*Time Horizon: Real-time Operations*]
- R5.** During the implementation of relief procedures, and up to the point that emergency action is necessary, Reliability Coordinators and Balancing Authorities shall comply with applicable Interchange scheduling standards. [*Violation Risk Factor: Medium*] [*Time Horizon: Real-time Operations*]

Comment: R5 will be reviewed during Phase 3 of the TLR drafting team work. See white paper for explanation of the three phases of changes to this standard.

C. Measures

- M1.** Each Reliability Coordinator shall be capable of providing evidence (such as logs) that demonstrate when Eastern Interconnection, WECC, or ERCOT Interconnection-wide transmission loading relief procedures are implemented, the implementation follows the respective established procedure as specified in this standard (R1, R1.1, R1.2 and R1.3).
- M2.** Each Reliability Coordinator shall be capable of providing evidence (such as written documentation) that the Transmission Operator experiencing the potential or existing SOL or IROL violations is a party to the local transmission loading relief or congestion management procedures when these procedures have been implemented (R2).
- M3.** Each Reliability Coordinator shall be capable of providing evidence (such as NERC meeting minutes) that the local procedure has received prior approval by the ERO when such procedure is used as a substitute for curtailment as directed by the Interconnection-wide procedure (R3).
- M4.** Each Reliability Coordinator shall be capable of providing evidence (such as logs) that the responding Reliability Coordinator complied with the provisions of the Interconnection-wide procedure as requested by the initiating Reliability Coordinator when requested to curtail an Interchange Transaction that crosses an Interconnection boundary (R4).
- M5.** Each Reliability Coordinator and Balancing Authority shall be capable of providing evidence (such as Interchange Transaction Tags, operator logs, voice recordings or transcripts of voice recordings, electronic communications, computer printouts) that

they have complied with applicable Interchange scheduling standards INT-001, INT-003, and INT-004 during the implementation of relief procedures, up to the point emergency action is necessary (R5).

D. Compliance

1. Compliance Monitoring Process

1.1. Compliance Monitoring Responsibility

Regional Entity.

1.2. Compliance Monitoring Period and Reset Time Frame

Compliance Monitoring Period: One calendar year.

Reset Period: One month without a violation.

1.3. Data Retention

The Reliability Coordinator shall maintain evidence for eighteen months for M1, M4, and M5.

The Reliability Coordinator shall maintain evidence for the duration the Transmission Operator is party to the procedure in effect plus one calendar year thereafter for M2.

The Reliability Coordinator shall maintain evidence for the approved duration of the procedure in effect plus one calendar year thereafter for M3.

1.4. Additional Compliance Information

Each Reliability Coordinator and Balancing Authority shall demonstrate compliance through self-certification submitted to its Compliance Monitor annually and reporting by exception. The Compliance Monitor may also use scheduled on-site reviews every three years, and investigations upon complaint, to assess performance.

Each Reliability Coordinator and Balancing Authority shall have the following available for its Compliance Monitor to inspect during a scheduled, on-site review or within 5 days of a request as part of an investigation upon complaint:

1.4.1 Operations logs, voice recordings or transcripts of voice recordings or other documentation providing the evidence of its compliance to all the requirements for all Interconnection-wide TLR procedures that it has implemented during the review period.

1.4.2 TLR reports.

2. Violation Severity Levels

2.1. Lower. There shall be a lower violation severity level if any of the following conditions exist:

2.1.1 For each TLR in the Eastern Interconnection, the Reliability Coordinator violates one (1) requirement of the applicable Interconnection-wide procedure (R1)

- 2.1.2** The Reliability Coordinators or Balancing Authorities did not comply with applicable Interchange scheduling standards during the implementation of the relief procedures, up to the point emergency action is necessary (R5).
- 2.1.3** When requested to curtail an Interchange Transaction that crosses an Interconnection boundary utilizing an Interconnection-wide procedure, the responding Reliability Coordinator did not comply with the provisions of the Interconnection-wide procedure as requested by the initiating Reliability Coordinator (R4).
- 2.2. Moderate. There shall be a moderate violation severity level if any of the following conditions exist:**

 - 2.2.1** For each TLR in the Eastern Interconnection, the Reliability Coordinator violated two (2) to three (3) requirements of the applicable Interconnection-wide procedure (R1).
- 2.3. High. There shall be a high violation severity level if any of the following conditions exist:**

 - 2.3.1** For each TLR in the Eastern Interconnection, the applicable Reliability Coordinator violated four (4) to five (5) requirements of the applicable Interconnection-wide procedure (R1).
- 2.4. Severe. There shall be a severe violation severity level if any of the following conditions exist:**

 - 2.4.1** For each TLR in the Eastern Interconnection, the Reliability Coordinator violated six (6) or more of the requirements of the applicable Interconnection-wide procedure (R1).
 - 2.4.2** A Reliability Coordinator implemented local transmission loading relief or congestion management procedures to relieve congestion but the Transmission Operator experiencing the congestion was not a party to those procedures (R2).
 - 2.4.3** A Reliability Coordinator implemented local transmission loading relief or congestion management procedures as a substitute for curtailment as directed by the Interconnection-wide procedure but the local procedure had not received prior approval from the ERO (R3).
 - 2.4.4** While attempting to mitigate an existing IROL violation in the Eastern Interconnection, the Reliability Coordinator applied TLR as the sole remedy for an existing IROL violation.
 - 2.4.5** While attempting to mitigate an existing constraint in the Western Interconnection using the “WSCC Unscheduled Flow Mitigation Plan”, the Reliability Coordinator did not follow the procedure correctly.
 - 2.4.6** While attempting to mitigate an existing constraint in ERCOT using Section 7 of the ERCOT Protocols, the Reliability Coordinator did not follow the procedure correctly.

E. Regional Differences

1. [PJM/MISO Enhanced Congestion Management](#) (Curtailment/Reload/Reallocation) Waiver approved March 25, 2004. To be retired upon completion of the field test, and in the interim the Regional Difference will be contained in both the NERC and NAESB standards.

This section on Regional Differences is highlighted for transfer to NAESB following completion of the MISO/PJM/SPP field test as described in the white paper.

2. Southwest Power Pool (SPP) Regional Difference – Enhanced Congestion Management (Curtailment/Reload/Reallocation). The SPP regional difference, which is equivalent to the PJM/MISO waiver, shall apply within the SPP region as follows:

This regional difference impacts actions on behalf of those SPP Balancing Authorities that are participating in the SPP market. This regional difference does not impact those Balancing Authorities for which SPP will continue to act as the Reliability Coordinator but that are not participating in the SPP market.

SPP shall calculate the impacts of SPP market flow on all facilities included in SPP's Coordinated Flowgate List. SPP shall conduct sensitivity studies to determine which external flowgates (outside SPP's footprint) are significantly impacted by the market flows of SPP's control zones (currently the balancing areas that exist today in the IDC). SPP shall perform studies to determine which external flowgates SPP will monitor and help control. An external flowgate selected by one of the studies will be considered a Coordinated Flowgate (CF).

In its calculation, SPP shall consider market flow impacts as the impacts of energy dispatched by the SPP market and self-dispatched energy serving load in the market footprint, but not tagged. SPP shall use a method equivalent to the PJM/MISO Market Flow Calculation methodology identified in the PJM/MISO waiver. Impacts of tagged transactions representing delivery of energy not dispatched by the SPP market and energy dispatched by the market but delivered outside the footprint will not be included in market flow.

SPP shall separate the market flow impacts for current hour and next hour into their appropriate priorities and shall provide those market flow impacts to the IDC. The market flows will be represented in the IDC and made available for curtailment under the appropriate TLR Levels. The market flow impacts will not be represented by conventional interchange transaction tags.

The SPP method will impact the following sections of the TLR Procedure:

Network and Native Load (NNL) Calculations — The SPP regional difference modifies Attachment 1-IRO-006-1 Section 5 “Parallel Flow Calculation Procedure for Reallocating or Curtailing Firm Transmission Service” within the SPP region.

Section 5 of Attachment 1-IRO-006-1 requires that the “Per Generator Method without Counter Flow” methodology be utilized to calculate the portion of parallel flows on any Constrained Facility due to Network Integration (NI) transmission service and service to Native Load (NL) of each balancing authority.

SPP shall use a “Market Flow Calculation” methodology to calculate the portion of parallel flows on all facilities included in the RTO’s “Coordinated Flowgate List” due to NI service or service to NL of each balancing authority.

The Market Flow Calculation differs from the Per Generator Method in the following ways:

- The contribution from all market area generators will be taken into account.
- In the Per Generator Method, only generators having a GLDF greater than 5% are included in the calculation. Additionally, generators are included only when the sum of the maximum generating capacity at a bus is greater than 20 MW. The market flow calculations will use all positively impacting flows down to 0% with no threshold. Counter flows will not be included in the market flow calculation.
- The contribution of all market area generators is based on the present output level of each individual unit.
- The contribution of the market area load is based on the present demand at each individual bus.

By expanding on the Per Generator Method, the market flow calculation evolves into a methodology very similar to the “Per Generator Method” method, while providing increased Interchange Distribution Calculator (IDC) granularity. Counter flows are also calculated and tracked in order to account for and recognize that the either the positive market flows may be reduced or counter flows may be increased to provide appropriate relief on a flowgate.

These NNL values will be provided to the IDC to be included and represented with the calculated NNL values of other Balancing Authorities for the purposes of identifying and obtaining required NNL relief across a flowgate in congestion under a TLR Level 5A/5B.

Pro Rata Curtailment of Non-Firm Market Flow Impacts — The SPP regional difference modifies Attachment 1-IRO-006-1 Appendix B “Transaction Curtailment Formula” within the SPP region.

Appendix B “Transaction Curtailment Formula” details the formula used to apply a weighted impact to each non-firm tagged Interchange Transaction (Priorities 1 thru 6) for the purposes of Curtailment by the IDC. For the purpose of Curtailment, the non-firm market flow impacts (Priorities 2 and 6) submitted to the IDC by SPP should be curtailed pro-rata as is done for Interchange Transaction using firm transmission service. This is because several of the values needed to assign a weighted impact using the process listed in Appendix B will not be available:

- Distribution Factor (no tag to calculate this value from)
- Impact on Interface value (cannot be calculated without Distribution Factor)
- Impact Weighting Factor (cannot be calculated without Distribution Factor)
- Weighted Maximum Interface Reduction (cannot be calculated without Distribution Factor)

Standard IRO-006-4.1 — Reliability Coordination — Transmission Loading Relief

- Interface Reduction (cannot be calculated without Distribution Factor)
- Transaction Reduction (cannot be calculated without Distribution Factor)

While the non-firm market flow impacts submitted to the IDC are to be curtailed pro rata, the impacting non-firm tagged Interchange Transactions could still use the existing processes to assign the weighted impact value.

Assignment of Sub-Priorities — The SPP regional difference modifies Attachment 1-IRO-006-1 Appendix E “How the IDC Handles Reallocation”, Section E2 “Timing Requirements”, within the SPP region.

Under the header “IDC Calculations and Reporting” in Section E2 of Appendix E to Attachment 1-IRO-006-1, the following requirement exists: “In a TLR Level 3a the Interchange Transactions using Non-firm Transmission Service in a given priority will be further divided into four sub-priorities, based on current schedule, current active schedule (identified by the submittal of a tag ADJUST message), next-hour schedule, and tag status. Solely for the purpose of identifying which Interchange Transactions to be loaded under a TLR 3a, various MW levels of an Interchange Transaction may be in different sub-priorities. The sub-priorities are shown in the following table:

Priority	Purpose	Explanation and Conditions
S1	To allow a flowing Interchange Transaction to maintain or reduce its current MW amount in accordance with its energy profile.	The MW amount is the lowest between currently flowing MW amount and the next-hour schedule. The currently flowing MW amount is determined by the e-tag ENERGY PROFILE and ADJUST tables. If the calculated amount is negative, zero is used instead.
S2	To allow a flowing Interchange Transaction that has been curtailed or halted by TLR to reload to the lesser of its current-hour MW amount or next-hour schedule in accordance with its energy profile.	The Interchange Transaction MW amount used is determined through the e-tag ENERGY PROFILE and ADJUST tables. If the calculated amount is negative, zero is used instead.
S3	To allow a flowing Transaction to increase from its current-hour schedule to its next-hour schedule in accordance with its energy profile.	The MW amounts used in this sub-priority is determined by the e-tag ENERGY PROFILE table. If the calculated amount is negative, zero is used instead.
S4	To allow a Transaction that had never started and was submitted to the Tag Authority after the TLR (level 2 or higher) has been declared	The Transaction would not be allowed to start until all other Interchange Transactions submitted prior to the TLR with the same

Standard IRO-006-4.1 — Reliability Coordination — Transmission Loading Relief

	to begin flowing (i.e., the Interchange Transaction never had an active MW and was submitted to the IDC after the first TLR Action of the TLR Event had been declared.)	priority have been (re)loaded. The MW amount used is the sub-priority is the next-hour schedule determined by the e-tag ENERGY PROFILE table.
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SPP shall use a “Market Flow Calculation” methodology to calculate the amount of energy flowing across all facilities included in the RTO’s “Coordinated Flowgate List” that is associated with the operation of the SPP market. This energy is identified as “market flow.”

These market flow impacts for current hour and next hour will be separated into their appropriate priorities and provided to the IDC by SPP. The market flows will then be represented and made available for curtailment under the appropriate TLR Levels.

Even though these market flow impacts (separated into appropriate priorities) will not be represented by conventional “tags,” the impacts and their desired levels will still be provided to the IDC for current hour and next hour. Therefore, for the purposes of reallocation, a sub-priority (S1 thru S4) should be assigned to these market flow impacts by the NERC IDC as follows, using comparable logic as would be used if the impacts were in fact tagged transactions.

Priority	Purpose	Explanation and Conditions
S1	To allow existing market flow to maintain or reduce its current MW amount.	The currently flowing MW amount is the amount of market flow existing after the RTO has recognized the constraint for which TLR has been called. If the calculated amount is negative, zero is used instead.
S2	To allow market flow that has been curtailed or halted by TLR to reload to its desired amount for the current-hour.	This is the difference between the current hour unconstrained market flow and the current market flow. If the current-hour unconstrained market flow is not available, the IDC will use the most recent market flow since the TLR was first issued or, if not available, the market flow at the time the TLR was first issued.
S3	To allow a market flow to increase to its next-hour desired amount.	This is the difference between the next hour and current hour unconstrained market flow.

To be retired upon completion of the field test, and in the interim the Regional Difference will be contained in both the NERC and NAESB standards.

F. Associated Documents

Version History

Version	Date	Action	Change Tracking
0	April 1, 2005	Effective Date	New
0	August 8, 2005	Removed “Proposed” from Effective Date	Errata
1	August 8, 2005	Revised Attachment 1	Revision
3	February 26, 2007	Revised Purpose and Attachment 1 related to NERC NAESB split of the TLR procedure	Revision
4	October 23, 2007	Approved by Board of Trustees	Revision
4.1	April 15, 2009	The URL in R1.2. was corrected.	Errata

PLEASE NOTE: items designated for inclusion in the NAESB TLR business practice following completion of the standard revision were deleted. Please see the mapped document to see which items were move to NAESB and what future changes are expected.

Attachment 1 — IRO-006

Transmission Loading Relief Procedure — Eastern Interconnection

Purpose

This standard defines procedures for curtailment and reloading of Interchange Transactions to relieve overloads on transmission facilities modeled in the Interchange Distribution Calculator.

Applicability

This standard only applies to the Eastern Interconnection.

The flexibility for ISOs and RTOs to use redispatch is contained explicitly in the NAESB business practice Section 1.3.

1. Transmission Loading Relief (TLR) Procedure

1.1. Initiation only by Reliability Coordinator. A Reliability Coordinator shall be the only entity authorized to initiate the TLR Procedure.

1.1.1. Requesting relief on transmission facilities. Any Transmission Operator may request from its Reliability Coordinator relief on the transmission facilities it operates. A Reliability Coordinator shall review these requests for relief and determine the appropriate relief actions.

1.2. Mitigating SOL and IROL violations. A Reliability Coordinator may utilize the TLR Procedure to mitigate potential or existing System Operating Limit (SOL) violations or to prevent or mitigate Interconnection Reliability Operating Limit (IROL) violations on any transmission facility modeled in the IDC. However, the TLR procedure is an inappropriate and ineffective tool as a sole means to mitigate existing IROL violations due to the time required to implement the procedure. Reconfiguration, redispatch, and load shedding are more timely and effective in mitigating existing IROL violations

1.3. Sequencing of TLR Levels and taking emergency action. The Reliability Coordinator shall not be required to follow the TLR Levels in their numerical sequence (Section 2, “TLR Levels”). Furthermore, if a Reliability Coordinator deems that a transmission loading condition could jeopardize Bulk Electric System reliability, the Reliability Coordinator shall have the authority to enter TLR Level 6 directly, and immediately direct the Balancing Authorities or Transmission Operators to take such actions as redispatching generation, or reconfiguring transmission, or reducing load to mitigate the critical condition until Interchange Transactions can be reduced utilizing the TLR Procedure or other methods to return the system to a secure state.

1.4. Notification of TLR Procedure implementation. The Reliability Coordinator initiating the use of the TLR

This notification is automated in the Interchange Distribution Calculator (IDC) and populates a message on the NERC RCIS.

Procedure shall notify other Reliability Coordinators and Balancing Authorities and Transmission Operators, and must post the initiation and progress of the TLR event on the appropriate NERC web page(s).

1.4.1. Notifying other Reliability Coordinators. The Reliability Coordinator initiating the TLR Procedure shall inform all other Reliability Coordinators via the Reliability Coordinator Information System (RCIS) that the TLR Procedure has been implemented.

Actions expected. The Reliability Coordinator initiating the TLR Procedure shall indicate the actions expected to be taken by other Reliability Coordinators.

1.4.2. Notifying Transmission Operators and Balancing Authorities. The Reliability Coordinator shall notify Transmission Operators and Balancing Authorities in its Reliability Area when entering and leaving any TLR level.

1.4.3. Notifying Sink Balancing Authorities. The Reliability Coordinator for the sink Balancing Authority shall be responsible for directing the Sink Balancing Authority to curtail the Interchange Transactions as specified by the Reliability Coordinator implementing the TLR Procedure.

This notification is automated in the Interchange Distribution Calculator (IDC) and populates a message on the NERC RCIS.

Notification order. Within a Transmission Service Priority level, the Sink Balancing Authorities whose Interchange Transactions have the largest impact on the Constrained Facilities shall be notified first if practicable.

1.4.4. Updates. At least once each hour, or when conditions change, the Reliability Coordinator implementing the TLR Procedure shall update all other Reliability Coordinators (via the RCIS). Transmission Operators and Balancing Authorities who have had Interchange Transactions impacted by the TLR will be updated by their Reliability Coordinator.

1.5. Obligations. All Reliability Coordinators shall comply with the request of the Reliability Coordinator who initiated the TLR Procedure, unless the initiating Reliability Coordinator agrees otherwise.

1.6. Consideration of Interchange Transactions. The administration of the TLR Procedure shall be guided by information obtained from the IDC.

1.6.1. Interchange Transactions not in the IDC. Reliability Coordinators shall also treat known Interchange Transactions that may not appear in the IDC in accordance with the procedures in this document.

1.6.2. Transmission elements not in IDC. When a Reliability Coordinator is faced with an overload on a transmission element that is not modeled in the IDC, the Reliability Coordinator shall use the best information available to curtail Interchange Transactions in order to operate the system in a reliable manner. The Reliability Coordinator shall use its best efforts to ensure that Interchange Transactions with a Transfer Distribution Factor

of less than the Curtailment Threshold on the transmission element not modeled in the IDC are not curtailed.

1.6.3. Questionable IDC results. Any Reliability Coordinator who believes the curtailment list from the IDC for a particular TLR event is incorrect shall use its best efforts to communicate those adjustments necessary to bring the curtailment list into conformance with the principles of this Procedure to the initiating Reliability Coordinator. Causes of questionable IDC results may include:

- Missing Interchange Transactions that are known to contribute to the Constraint.
- Significant change in transmission system topology.
- TDF matrix error.

Impacts of questionable IDC results may include:

- Curtailment that would have no effect on, or aggravate the constraint.
- Curtailment that would initiate a constraint elsewhere.

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

1.6.4. Curtailment that would cause a constraint elsewhere. A Reliability Coordinator shall be allowed to exempt an Interchange Transaction from Curtailment if that Reliability Coordinator is aware that the Interchange Transaction Curtailment directed by the IDC would cause a constraint to occur elsewhere. This exemption shall only be allowed after the Reliability Coordinator has consulted with the Reliability Coordinator who initiated the Curtailment.

1.7 Logging. The Reliability Coordinator shall complete the NERC Transmission Loading Relief Procedure Log whenever it invokes TLR Level 2 or above, and send a copy of the log via email to NERC within two business days of the TLR event for posting on the NERC website.

Creation and distribution of the TLR Procedure Log is now automated in the IDC.

1.8 TLR Event Review. The Reliability Coordinator shall report the TLR event to the Operating Reliability Subcommittee in accordance with TLR review processes established by NERC as required.

1.8.1 Providing information. Transmission Operators and Balancing Authorities within the Reliability Coordinator's Area, and all other Reliability Coordinators, including Transmission Operators and Balancing Authorities within their respective Reliability Areas, shall provide information, as requested by the initiating Reliability Coordinator, in accordance with TLR review processes established by NERC.

1.8.2 Market Committee reviews. The Market Committee may conduct reviews of certain TLR events based on the size and number of Interchange Transactions that are affected, the frequency that the TLR Procedure is called for a particular Constrained Facility, or other factors.

The Market Committee no longer exists and this requirement will be removed in Phase 3.

1.8.3 Operating Reliability Subcommittee reviews. The Operating Reliability Subcommittee shall conduct reviews to ensure proper implementation and for “lessons learned.”

2. Transmission Loading Relief (TLR) Levels

Introduction

This section describes the various levels of the TLR Procedure. The description of each level begins with the circumstances that define the TLR Level, followed by the procedures to be followed.

The decision that a Reliability Coordinator makes in selecting a particular TLR Level often depends on the transmission loading condition and whether the Interchange Transaction is using Non-firm Point-to-Point Transmission Service or Firm Point-to-Point Transmission Service. There are further considerations that depend on whether the Constrained Facility is on or off the Contract Path. It is important to note that an Interchange Transaction using Firm Point-to-Point Transmission Service on all Contract Path links is considered a “firm” Interchange Transaction even if the Constrained Facility is off the Contract Path.

2.1. TLR Level 1 — Notify Reliability Coordinators of potential SOL or IROL Violations

2.1.1. The Reliability Coordinator shall use the following circumstances to establish the need for TLR Level 1:

- The transmission system is secure.
- The Reliability Coordinator foresees a transmission or generation contingency or other operating problem within its Reliability Area that could cause one or more transmission facilities to approach or exceed their SOL or IROL.

2.1.2. Notification procedures. The Reliability Coordinator shall notify all Reliability Coordinators via the Reliability Coordinator Information System (RCIS) as soon as the condition is foreseen. All affected Reliability Coordinators shall check to ensure that Interchange Transactions are posted in the IDC.

2.2. TLR Level 2 — Hold transfers at present level to prevent SOL or IROL Violations

2.2.1. The Reliability Coordinator shall use the following circumstances to establish the need for entering TLR Level 2:

- The transmission system is secure.
- One or more transmission facilities are expected to approach, or are approaching, or are at their SOL or IROL.

2.3 TLR Level 3a — Reallocation of Transmission Service by curtailing Interchange Transactions using Non-firm Point-to-Point Transmission Service to allow Interchange Transactions using higher priority Transmission Service

2.3.1. The Reliability Coordinator shall use the following circumstances to establish the need for entering TLR Level 3a:

- The transmission system is secure.
- One or more transmission facilities are expected to approach, or are approaching, or are at their SOL or IROL.
- Transactions using Non-firm Point-to-Point Transmission Service are flowing that are at or above the Curtailment Threshold on those facilities.
- The Transmission Provider has previously approved a higher priority Point-to-Point Transmission Service reservation over which a Transmission Customer wishes to begin an Interchange Transaction.

2.4. TLR Level 3b — Curtail Interchange Transactions using Non-Firm Transmission Service Arrangements to mitigate a SOL or IROL Violation

2.4.1. The Reliability Coordinator shall use the following circumstances to establish the need for entering TLR Level 3b:

- One or more transmission facilities are operating above their SOL or IROL, or
- Such operation is imminent and it is expected that facilities will exceed their reliability limit unless corrective action is taken, or
- One or more Transmission Facilities will exceed their SOL or IROL upon the removal from service of a generating unit or another transmission facility.
- Transactions using Non-firm Point-to-Point Transmission Service are flowing that are at or above the Curtailment Threshold on those facilities.

2.5 TLR Level 4 — Reconfigure Transmission

2.5.1. The Reliability Coordinator shall use the following circumstances to establish the need for entering TLR Level 4:

- One or more Transmission Facilities are above their SOL or IROL, or
- Such operation is imminent and it is expected that facilities will exceed their reliability limit unless corrective action is taken.

2.5.2. Reconfiguration procedures. The issuance of a TLR Level 4 shall result in the curtailment, in the current hour and the next hour, of all Interchange Transactions using Non-firm Point-to-Point Transmission Service that are at or above the Curtailment Threshold that impact the Constrained

Facilities. If a SOL or IROL violation is imminent or occurring, the Reliability Coordinator(s) shall request that the affected Transmission Operators reconfigure transmission on their system, or arrange for reconfiguration on other transmission systems, to mitigate the constraint.

2.6. TLR Level 5a — Reallocation of Transmission Service by curtailing Interchange Transactions using Firm Point-to-Point Transmission Service on a pro rata basis to allow additional Interchange Transactions using Firm Point-to-Point Transmission Service

2.6.1. The Reliability Coordinator shall use the following circumstances to establish the need for entering TLR Level 5a:

- The transmission system is secure.
- One or more transmission facilities are at their SOL or IROL.
- All Interchange Transactions using Non-firm Point-to-Point Transmission Service that are at or above the Curtailment Threshold have been curtailed.
- The Transmission Provider has been requested to begin an Interchange Transaction using previously arranged Firm Transmission Service that would result in a SOL or IROL violation.
- No further transmission reconfiguration is possible or effective.

2.7. TLR Level 5b — Curtail Interchange Transactions using Firm Point-to-Point Transmission Service to mitigate an SOL or IROL violation

2.7.1. The Reliability Coordinator shall use following circumstances to establish the need for entering TLR Level 5b:

- One or more Transmission Facilities are operating above their SOL or IROL, or
- Such operation is imminent, or
- One or more Transmission Facilities will exceed their SOL or IROL upon the removal from service of a generating unit or another transmission facility.
- All Interchange Transactions using Non-firm Point-to-Point Transmission Service that are at or above the Curtailment Threshold have been curtailed.
- No further transmission reconfiguration is possible or effective.

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2.8. Curtailment of Interchange Transactions Using Firm Transmission Service

2.8.1. The Reliability Coordinator shall direct the curtailment of Interchange Transactions using Firm Transmission Service that are at or above the Curtailment Threshold for the following TLR Levels:

2.8.1.1. TLR Level 5a. Enable additional Interchange Transactions using Firm Point-to-Point Transmission Service to be implemented after all Interchange Transactions using Non-firm Point-to-Point Service have been curtailed, or

2.8.1.2. TLR Level 5b. Mitigate a SOL or IROL violation that remains after all Interchange Transactions using Non-firm Transmission Service has been curtailed under TLR Level 3b, and following attempts to reconfigure transmission under TLR Level 4.

2.9. TLR Level 6 — Emergency Procedures

2.9.1 The Reliability Coordinator shall use following circumstances to establish the need for entering TLR Level 6:

- One or more Transmission Facilities are above their SOL or IROL.
- One or more Transmission Facilities will exceed their SOL or IROL upon the removal from service of a generating unit or another transmission facility.

2.9.2 Implementing emergency procedures. If the Reliability Coordinator deems that transmission loading is critical to Bulk Electric System reliability, the Reliability Coordinator shall immediately direct the Balancing Authorities and Transmission Operators in its Reliability Area to redispatch generation, or reconfigure transmission, or reduce load to mitigate the critical condition until Interchange Transactions can be reduced utilizing the TLR Procedures or other procedures to return the system to a secure state. All Balancing Authorities and Transmission Operators shall comply with all requests from their Reliability Coordinator.

2.10 TLR Level 0 — TLR concluded

2.10.1 Interchange Transaction restoration and notification procedures. The Reliability Coordinator initiating the TLR Procedure shall notify all Reliability Coordinators within the Interconnection via the RCIS when the SOL or IROL violations are mitigated and the system is in a reliable state, allowing Interchange Transactions to be reestablished at its discretion. Those with the highest transmission priorities shall be reestablished first if possible.

3. Requirements

3.1 The Reliability Coordinator shall be allowed to call a TLR 3b at any time to help mitigate a SOL or IROL violation.

- 3.2** The Reliability Coordinator shall Reallocate Interchange Transactions using Non-firm Point-to-Point Transmission for the next hour to maintain the desired flow using Reallocation in accordance with the following timing specification:
- 3.2.1** If issued prior to XX: 25, Non-firm Interchange Transactions will be curtailed to meet the desired current hour relief
 - 4.2.1.1** At XX: 25 a Reallocation will be performed to maintain the desired flow at the top of the following hour
 - 3.2.2** If issued after XX: 25, Non firm Interchange Transactions will be curtailed to meet the desired current hour relief and a Reallocation will be performed to maintain the target flow identified for the current hour.
 - 3.2.3** Transactions must be in the IDC by the Approved-tag Submission Deadline for Reallocation.
- 3.3** The IDC shall issue ADJUST Lists to the Generation and Load Balancing Authority Areas and the Purchasing-Selling Entity who submitted the tag. The ADJUST List will include: (recommended to be moved to Attachment 2)
- 3.3.1** Interchange Transactions using Non-firm Point-to-Point Transmission Service that are to be curtailed or held during current and next hours. (recommended to be moved to Attachment 2)
 - 3.3.2** Interchange Transactions using Firm Point-to-Point Transmission Service that were entered after XX:25 or issuance of TLR 3b (see Case 3 in Appendix F). (recommended to be moved to Attachment 2)
- 3.4** The Sink Balancing Authority shall send the ADJUST Lists back to the IDC as soon as possible to ensure the most accurate calculations for actions subsequent to the TLR 3b being called. (recommend to be moved to Attachment 2)
- 3.5** The Reliability Coordinator will no longer be required to call a TLR Level 3a as soon as the SOL or IROL violation that caused the TLR 3b to be called has been mitigated due to the inherent next hour Reallocation that takes place for the top of the next hour in the TLR Level 3b. (recommend to be moved to Attachment 2)

Appendices for Transmission Loading Relief Standard

PLEASE NOTE: items designated for inclusion in the NAESB TLR business practice following completion of the standard revision were deleted from this version of the NERC standard. Please see the mapped document to see which requirements were moved to NAESB and what future changes are expected. Appendices B, D, G, and the sub-priority portions of E-2 have been moved to NAESB, The appendices below (A, C, E, F) will be renumbered in the final standard.

Appendix A. Transaction Management and Curtailment Process.

Appendix C. Sample NERC Transmission Loading Relief Procedure Log.

Appendix E. How the IDC Handles Reallocation.

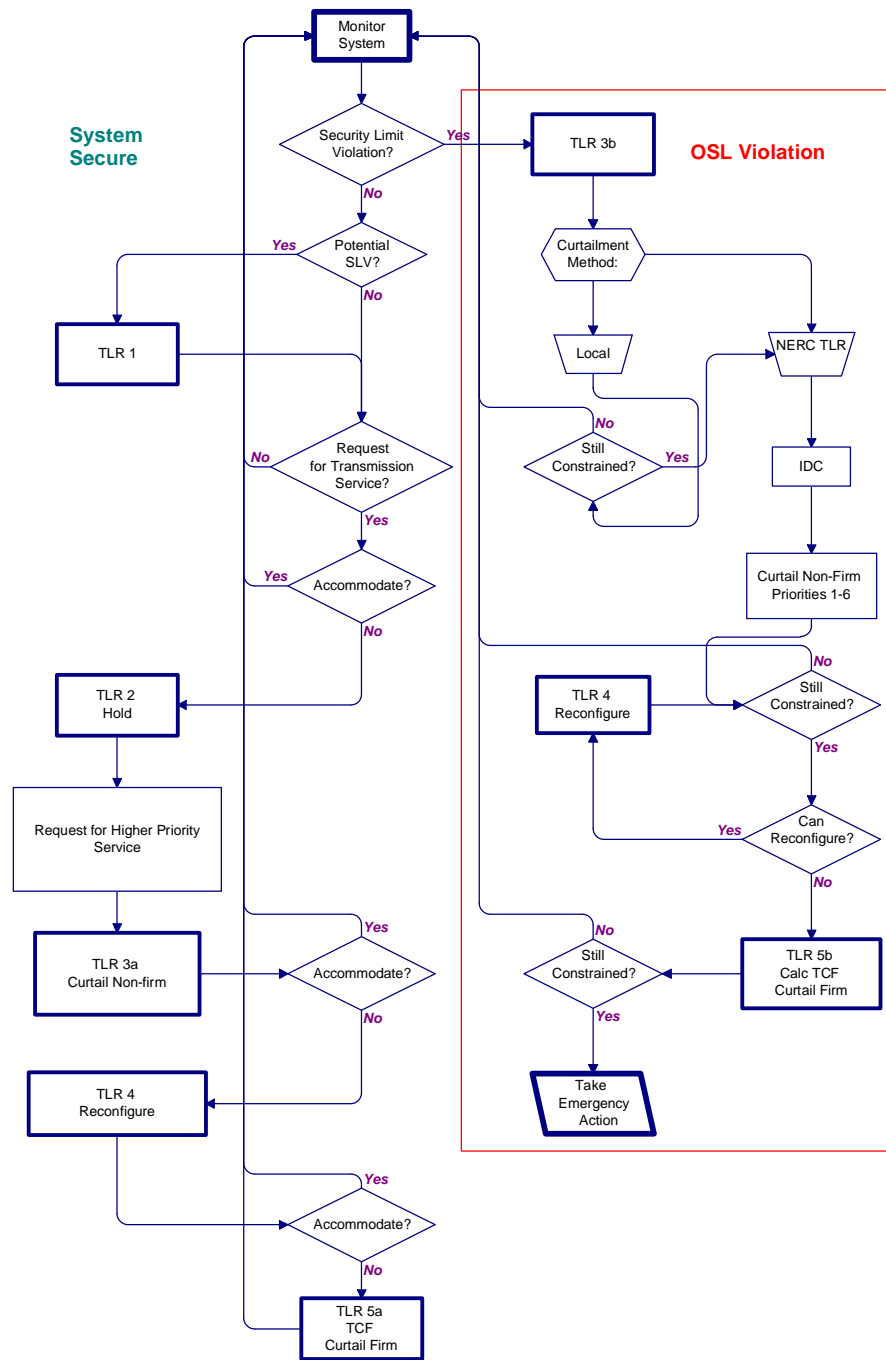
Section E1: Summary of IDC Features that Support Transaction Reloading/Reallocation.

Section E2: Timing Requirements.

Appendix F. Considerations for Interchange Transactions using Firm Point-to-Point Transmission Service.

Appendix A. Transaction Management and Curtailment Process

This flowchart depicts an overview of the Transaction Management and Curtailment process. Detailed decisions are not shown.



Appendix E. How the IDC Handles Reallocation

The IDC algorithms reflect the Reallocation and reloading principles in this Appendix, as well as the reporting requirements, and status display. The IDC will obtain the Tag Submittal Time from the Tag Authority and post the Reloading/Reallocation information to the NERC TLR website.

A summary of IDC features that support the Reallocation process is provided in Attachment E1. Details on the interface and display features are provided in Attachment E2. Refer to Version 1.7.095 NERC Transaction Information Systems Working Group (TISWG) *Electronic Tagging Functional Specification* for details about the E-Tag system.

E1. Summary of IDC Features that Support Transaction Reloading/Reallocation

The following is a summary of IDC features and E-Tag interface that support Reloading/Reallocation:

Information posted from IDC to NERC TLR website.

1. Restricted directions (all source/sink combinations that impact a Constrained Facility(ies) with TLR 2 or higher) will be posted to the NERC TLR website and updated as necessary.
2. TLR Constrained Facility status and Transfer Distribution Factors will continue to be posted to NERC TLR website.
3. Lowest priority of Interchange Transactions (marginal “bucket”) to be Reloaded/Reallocated next-hour on each TLR Constrained Facility will be posted on NERC TLR website. This will provide an indication to the market of priority of Interchange Transactions that may be Reloaded/Reallocated the following hours.

IDC Logic, IDC Report, and Timing

1. The Reliability Coordinator will run the IDC the Reloading/Reallocation report at approximately 00:26. The IDC will prompt the Reliability Coordinator to enter a maximum loading value. The IDC will alarm if the Reliability Coordinator does not enter this value and issue a report by 00:30 or change from TLR 3a Level. The Report will be distributed to Balancing Authorities and Transmission Operators at 00:30. This process repeats every hour as long as the approved tag submission deadline for Reallocation is in effect (or until the TLR level is reduced to 1 or 0).
2. For Interchange Transactions in the restricted directions, tags must be submitted to the IDC by the approved tag submission deadline for Reallocation to be considered for Reallocation next-hour. The time stamp by the Tag Authority is regarded the official tag submission time.
3. Tags submitted to IDC after the approved tag submission deadline for Reallocation will not be allowed to start or increase but will be considered for Reallocation the next hour.
4. Interchange Transactions in restricted directions that are not indicated as “PROCEED” on the Reload/Reallocation Report will not be permitted to start or increase next hour.

Reloading/Reallocation Transaction Status

Reloading/Reallocation status will be determined by the IDC for all Interchange Transactions. The Reloading/Reallocation status of each Interchange Transaction will be listed on IDC reports and NERC TLR website as appropriate. An Interchange Transaction is considered to be in a restricted direction if it is at or above the Curtailment Threshold. Interchange Transactions below the Curtailment Threshold are unrestricted and free to flow subject to all applicable Reliability Standards and tariff rules.

1. **HOLD.** Permission has not been given for Interchange Transaction to start or increase and is waiting for the next Reloading/Reallocation evaluation for which it is a candidate. Interchange Transactions with E-tags submitted to the Tag Authority prior to TLR 2 or higher being declared (pre-tagged) will change to CURTAILED Status upon evaluation that does not permit them to start or increase. Transactions with E-tags submitted to Tag Authority after TLR 2 or higher was declared (post-tagged) will retain HOLD Status until given permission to proceed or E-Tag expires.
2. **CURTAILED.** Transactions for which E-Tags were submitted to Tag Authority prior to TLR 2 or higher being declared (pre-tagged) and ordered to be curtailed totally, curtailed partially, not permitted to start, or not permitted to increase. Interchange Transactions (pre-tagged or post-tagged) that were flowing and ordered to be reduced or totally curtailed. The Balancing Authority will indicate to the IDC through the E-Tag adjustment table the Interchange Transaction's curtailed values.
3. **PROCEED:** Interchange Transaction is flowing or has been permitted to flow as a result of Reloading/Reallocation evaluation. The Balancing Authority will indicate through the E-Tag adjustment table to IDC if Interchange Transaction will reload, start, or increase next-hour per Purchasing-Selling Entity's energy schedule as appropriate.

Reallocation/Reloading Priorities

1. Interchange Transaction candidates are ranked for loading and curtailment by priority as per Section 4, "Principles for Mitigating Constraints On and Off the Contract Path." This is called the "Constrained Path Method," or CPM. (secondary, hourly, daily, ... firm etc). Interchange Transactions are curtailed and loaded pro-rata within priority level per TLR algorithm.
2. Reloading/Reallocation of Interchange Transactions are prioritized first by priority per CPM. E-Tags must be submitted to the IDC by the approved tag submission deadline for Reallocation of the hour during which the Interchange Transaction is scheduled to start or increase to be considered for Reallocation.
3. During Reloading/Reallocation, Interchange Transactions using lower priority Transmission Service will be curtailed pro-rata to allow higher priority transactions to reload, increase, or start. Equal priority Interchange Transactions will not reload, start, or increase by pro-rata Curtailment of other equal priority Interchange Transactions.
4. Reloading of Interchange Transactions using Non-firm Transmission Service with CURTAILED Status will take precedence over starting or increasing of Interchange

Transactions using Non-firm Transmission Service of the same priority with PENDING Statuses.

5. Interchange Transactions using Firm Point-to-Point Transmission Service will be allowed to start as scheduled under TLR 3a as long as their E-Tag was received by the IDC by the approved tag submission deadline for Reallocation of the hour during which the Interchange Transaction is due to start or increase, regardless of whether the E-tag was submitted to the Tag Authority prior to TLR 2 or higher being declared or not. If this is the initial issuance of the TLR 3a, Interchange Transactions using Firm Point-to-Point Transmission Service will be allowed to start as scheduled as long as their E-Tag was received by the IDC by the time the TLR is declared.

Total Flow Value on a Constrained Facility for Next Hour

1. The Reliability Coordinator will calculate the change in net flow on a Constrained Facility due to Reallocation for the next hour based on:
 - Present constrained facility loading, present level of Interchange Transactions, and Balancing Authorities NNative Load responsibility (TLR Level 5a) impacting the Constrained Facility,
 - SOLs or IROLs, known interchange impacts and Balancing Authority NNative Load responsibility (TLR Level 5a) on the Constrained Facility the next hour, and
 - Interchange Transactions scheduled to begin the next hour.
2. The Reliability Coordinator will enter a maximum loading value for the constrained facility into the IDC as part of issuing the Reloading/Reallocation report.
3. The Reliability Coordinator is allowed to call for TLR 3a or 5a when approaching a SOL or IROL to allow maximum transactional flow next hour, and to manage flows without violating transmission limits.
4. The simultaneous curtailment and Reallocation for a Constrained Facility is allowed. This reduces the flow over the Constrained Facility while allowing Interchange Transactions using higher priority Transmission Service to start or increase the next hour. This may be used to accommodate change in flow next-hour due to changes other than Point-to-Point Interchange Transactions while respecting the priorities of Interchange Transactions flowing and scheduled to flow the next hour. The intent is to reduce the need for using TLR 3b, which prevents new Interchange Transactions from starting or increasing the next hour.
5. The Reliability Coordinator must allow Interchange Transactions to be reloaded as soon as possible. Reloading must be in an orderly fashion to prevent a SOL or IROL violation from (re)occurring and requiring holding or curtailments in the restricted direction.

E2. Timing Requirements

TLR Levels 3a and 5a Issuing/Processing Time Requirement

1. In order for the IDC to be reasonably certain that a TLR Level 3a or 5a re-allocation/reloading report in which all tags submitted by the approved tag submission deadline for Reallocation are included, the report must be generated no earlier than 00:25 to allow the 10-minute approval time for Transactions that start next hour.
2. In order to allow a Reliability Coordinator to declare a TLR Level 3a or 5a at any time during the hour, the TLR declaration and Reallocation/Reloading report distribution will be treated as independent processes by the IDC. That is, a Reliability Coordinator may declare a TLR Level 3a or 5a at any time during the course of an hour. However, if a TLR Level 3a or 5a is declared for the next hour prior to 00:25 (see Figure 5 at right), the Reallocation/Reloading report that is generated will be made available to the issuing Reliability Coordinator only for previewing purposes, and cannot be distributed to the other Reliability Coordinators or the market. Instead, the issuing Reliability Coordinator will be reminded by an IDC alarm at 00:25 to generate a new Reallocation/Reloading report that will include all tags submitted prior to the approved tag submission deadline for Reallocation.
3. A TLR Level 3a or 5a Reallocation/Reloading report must be confirmed by the issuing Reliability Coordinator prior to 00:30 in order to provide a minimum of 30 minutes for the Reliability Coordinators with tags sinking in its Reliability Area to coordinate the Reallocation and Reloading with the Sink Balancing Authorities. This provides only 5 minutes (from 00:25 to 00:30) for the issuing Reliability Coordinator to generate a Reallocation/Reloading report, review it, and approve it.
4. The TLR declaration time will be recorded in the IDC for evaluating transaction sub-priorities for Reallocation/Reloading purposes (see Subpriority Table, in the **IDC Calculations and Reporting** section below).

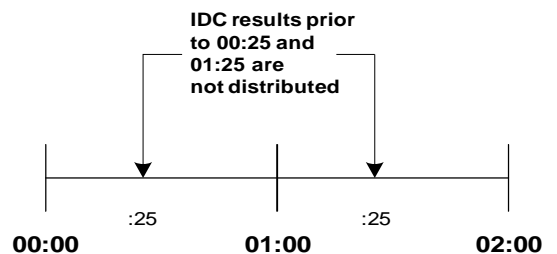


Figure 5 - IDC report may be run prior to 00:25, but results are not distributed.

Re-Issuing of a TLR Level 2 or Higher

Each hour, the IDC will automatically remind the issuing Reliability Coordinator (via an IDC alarm) of a TLR level 2 or higher declared in the previous hour or earlier about re-issuing the TLR. The purpose of the reminder is to enable the Reliability Coordinator to Reallocate or reload currently halted or curtailed Interchange Transactions next hour. The reminder will be in the form of an alarm to the issuing Reliability Coordinator, and will take place at 00:25 so that, if the Reliability Coordinator re-issues the TLR as a TLR level 3a or 5a, all tags submitted prior to the approved tag submission deadline for Reallocation are available in the IDC.

IDC Assistance with Next Hour Point-to-Point Transactions

In order to assist a Reliability Coordinator in determining the MW relief required on a Constrained Facility for the next hour for a TLR level 3a or 5a, the IDC will calculate and present the total MW impact of all currently flowing and scheduled Point-to-Point Transactions

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for the next hour. In order to assist a Reliability Coordinator in determining the MW relief required on a Constrained Facility for the next hour during a TLR level 5a, the IDC will calculate and present the total MW impact of all currently flowing and scheduled Point-to-Point Transactions for the next hour as well as Balancing Authority with flows due to service to Network Customers and Native Load. The Reliability Coordinator will then be requested to provide the total incremental or decremental MW amount of flow through the Constrained Facility that can be allowed for the next hour. The value entered by the Reliability Coordinator and the IDC-calculated amounts will be used by the IDC to identify the relief/reloading amounts (delta incremental flow value) on the constrained facility. The IDC will determine the Transactions to be reloaded, reallocated, or curtailed to make room for the Transactions using higher priority Transmission Service. The following examples show the calculation performed by IDC to identify the “delta incremental flow:”

Example 1

Flow to maintain on Facility	800 MW
Expected flow next hour from Transactions using Point-to-Point Transmission Service	950 MW
Contribution from flow next hour from service to Network customers and Native Load	-100 MW
Expected Net flow next hour on Facility	850 MW
Amount of Transactions using Point-to-Point Transmission Service to hold for Reallocation	850 MW – 800 MW = 50 MW
Amount to enter into IDC for Transactions using Point-to-Point Transmission Service	950 MW – 50 MW = 900 MW

Example 2

Flow to maintain on Facility	800 MW
Expected flow next hour from Transactions using Point-to-Point Transmission Service	950 MW
Contribution from flow next hour from service to Network customers and Native Load	50 MW
Expected Net flow next hour on Facility	1000 MW
Amount of Transactions using Point-to-Point Transmission Service to hold for Reallocation	1000 MW – 800 MW = 200 MW
Amount to enter into IDC for Transactions using Point-to-Point Transmission Service	950 MW – 200 MW = 750 MW

Example 3

Flow to maintain on Facility	800 MW
Expected flow next hour from Transactions using Point-	950 MW

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to-Point Transmission Service	
Contribution from flow next hour from service to Network customers and Native Load	-200 MW
Expected Net flow next hour on Facility	750 MW
Amount of Transactions using Point-to-Point Transmission Service to hold for Reallocation	750 MW – 800 MW = -50 MW None are held

For a TLR levels 3b or 5b the IDC will request the Reliability Coordinator to provide the MW requested relief amount on the Constrained Facility, and will not present the current and next hour MW impact of Point-to-Point transactions. The Reliability Coordinator-entered requested relief amount will be used by the IDC to determine the Interchange Transaction Curtailments and flows due to service to Network Customers and Native Load (TLR Level 5b) in order to reduce the SOL or IROL violation on the Constrained Facility by the requested amount.

IDC Calculations and Reporting

At the time the TLR report is processed, the IDC will use all candidate Interchange Transactions for Reallocation that met the approved tag submission deadline for Reallocation plus those Interchange Transactions that were curtailed or halted on the previous TLR action of the same TLR event. The IDC will calculate and present an Interchange Transactions Halt/Curtailment list that will include reload and Reallocation of Interchange Transactions. The Interchange Transactions are prioritized as follows:

1. All Interchange Transactions will be arranged by Transmission Service Priority according to the Constrained Path Method. These priorities range from 1 to 6 for the various non-firm Transmission Service products (TLR levels 3a and 3b). Interchange Transactions using Firm Transmission Service (priority 7) are used only in TLR levels 5a and 5b. Next-Hour Market Service is included at priority 0 (Recommended to be placed in Attachment 2).

Examples of Interchange Transactions using Non-firm Transmission Service sub-priority settings begin in the **Transaction Sub-priority Examples** following sections

2. All Interchange Transactions using Firm Transmission Service will be put in the same priority group, and will be Curtailed/Reallocated pro-rata, independent of their current status (curtailed or halted) or time of submittal with respect to TLR issuance (TLR level 5a). Under a TLR 5a, all Interchange Transactions using Non-firm Transmission Service that is at or above the Curtailment Threshold will have been curtailed and hence sub-prioritizing is not required.

All Interchange Transactions processed in a TLR are assigned one of the following statuses:

PROCEED: The Interchange Transaction has started or is allowed to start to the next hour MW schedule amount.

CURTAILED: The Interchange Transaction has started and is curtailed due to the TLR, or it had not started but it was submitted prior to the TLR being declared (level 2 or higher).

HOLD: The Interchange Transaction had never started and it was submitted after the TLR being declared – the Interchange Transaction is held from starting next hour or the transaction had never started and it was submitted to the IDC after the Approved-Tag Submission Deadline – the Interchange Transaction is to be held from starting next hour and is not included in the Reallocation calculations until following hour.

Upon acceptance of the TLR Transaction Reallocation/reloading report by the issuing Reliability Coordinator, the IDC will generate a report to be sent to NERC that will include the PSE name and Tag ID of each Interchange Transaction in the IDC TLR report. The Interchange Transaction will be ranked according to its assigned status of HOLD, CURTAILED or PROCEED. The reloading/Reallocation report will be made available at NERC's public TLR website, and it is NERC's responsibility to format and publish the report.

Tag Reloading for TLR Levels 1 and 0

When a TLR Level 1 or 0 is issued, the Constrained Facility is no longer under SOL or IROL violation and all Interchange Transactions are allowed to flow. In order to provide the Reliability Coordinators with a view of the Interchange Transactions that were halted or curtailed on previous TLR actions (level 2 or higher) and are now available for reloading, the IDC provides such information in the TLR report.

New Tag Alarming

Those Interchange Transactions that are at or above the Curtailment Threshold and are *not* candidates for Reallocation because the tags for those Transactions were not submitted by the approved tag submission deadline for Reallocation will be flagged as HOLD and must not be permitted to start or increase during the next hour. To alert Reliability Coordinators of those Transactions required to be held, the IDC will generate a report (for viewing within the IDC only) at various times. The report will include a list of all HOLD Transactions. In order not to overwhelm the Reliability Coordinator with alarms, only those who issued the TLR and those whose Transactions sink within their Reliability Area will be alarmed. An alarm will be issued for a given tag only once and will be issued for all TLR levels for which halting new Transactions is required: TLR Level 2, 3a, 3b, 5a and 5b.

Tag Adjustment

The Interchange Transactions with statuses of HOLD, CURTAILED or PROCEED must be adjusted by a Tag Authority or Tag Approval entity. Without the tag adjustments, the IDC will assume that Interchange Transactions were not curtailed/held and are flowing at their specified schedule amounts.

1. Interchange Transactions marked as CURTAILED should be adjusted to a cap equal to, or at the request of the originating PSE, less than the reallocated amount (shown as the MW CAP on the IDC report). This amount may be zero if the Transaction is fully curtailed.
2. Interchange Transaction marked as PROCEED should be adjusted to reload (NULL or to its MW level in accordance with its Energy Profile in the adjusted MW in the E-Tag) if the Interchange Transaction has been previously adjusted; otherwise, if the Interchange Transaction is flowing in full, the Tag Authority need not issue an adjust.
3. Interchange Transactions marked as HOLD should be adjusted to 0 MW.

Special Tag Status

There are cases in which a tag may be marked with a composite state of ATTN_REQD to indicate that tag Authority/Approval failed to communicate or there is an inconsistency between the validation software of different tag Authority/Approval entities. In this situation, the tag is no longer subject to passive approval and its status change to IMPLEMENT may take longer than 10 minutes. Under these circumstances, the IDC may have a tag that is issued prior to the Tag Submittal Deadline that will not be a candidate for Reallocation. Such tags, when approved by the Tag Authority, will be marked as HOLD and must be halted.

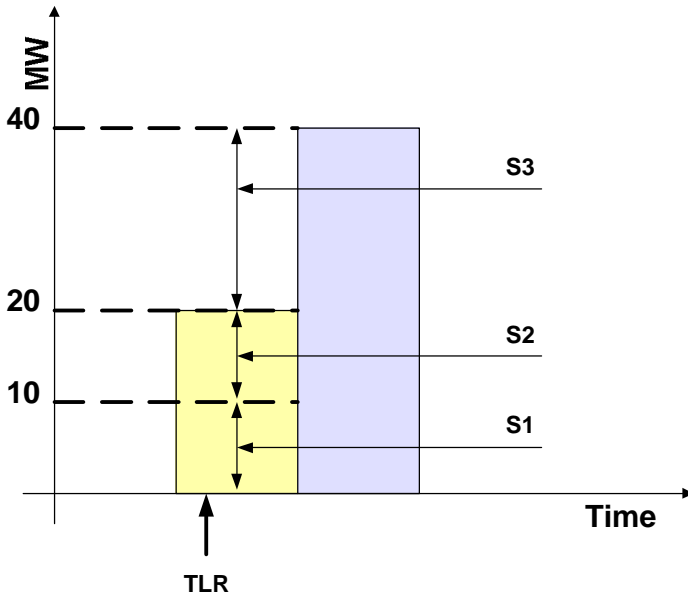
Transaction Sub-Priority Examples

The following describes examples of Interchange Transactions using Non-firm Transmission Service sub-priority setting for an Interchange Transaction under different circumstances of current-hour and next-hour schedules and active MW flowing as modified by tag adjust table in E-Tag.

Standard IRO-006-4.1 — Reliability Coordination — Transmission Loading Relief

Example 1 – Transaction curtailed, next-hour Energy Profile is higher

Energy Profile: Current hour	20 MW
Actual flow following curtailment: Current hour	10 MW
Energy Profile: Next hour	40 MW

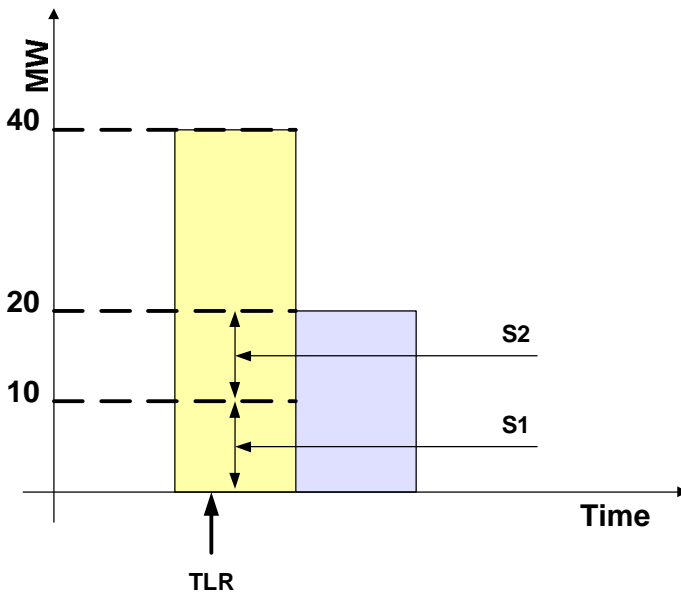


Sub-priorities for Transaction MW:

<i>Sub-Priority</i>	<i>MW Value</i>	<i>Explanation</i>
S1	10 MW	Maintain current curtailed flow
S2	+10 MW	Reload to current hour Energy Profile
S3	+20 MW	Load to next hour Energy Profile
S4		

Example 2 – Transaction curtailed, next-hour Energy Profile is lower

Energy Profile: Current hour	40 MW
Actual flow following curtailment: Current hour	10 MW
Energy Profile: Next hour	20 MW

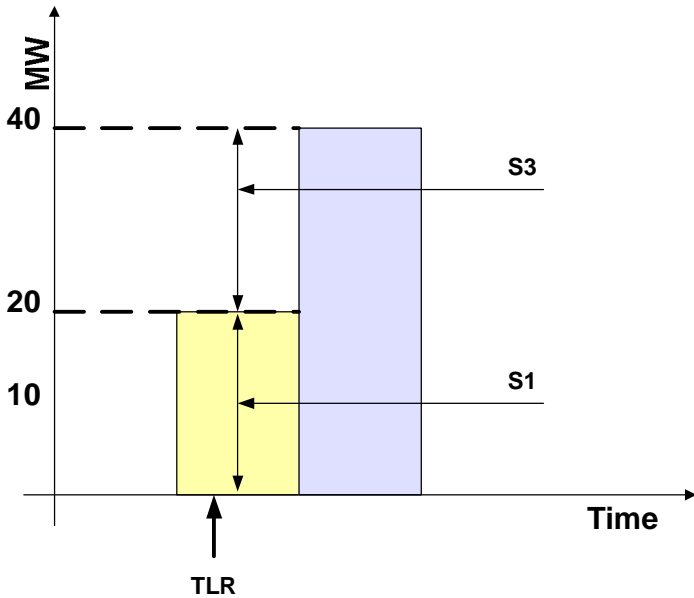


Sub-priorities for Transaction MW:

<i>Sub-Priority</i>	<i>MW Value</i>	<i>Explanation</i>
S1	10 MW	Maintain current curtailed flow
S2	+10 MW	Reload to <i>lesser</i> of current and next-hour Energy Profile
S3	+0 MW	Next-hour Energy Profile is 20MW, so no change in MW value
S4		

Example 3 – Transaction not curtailed, next-hour Energy Profile is higher

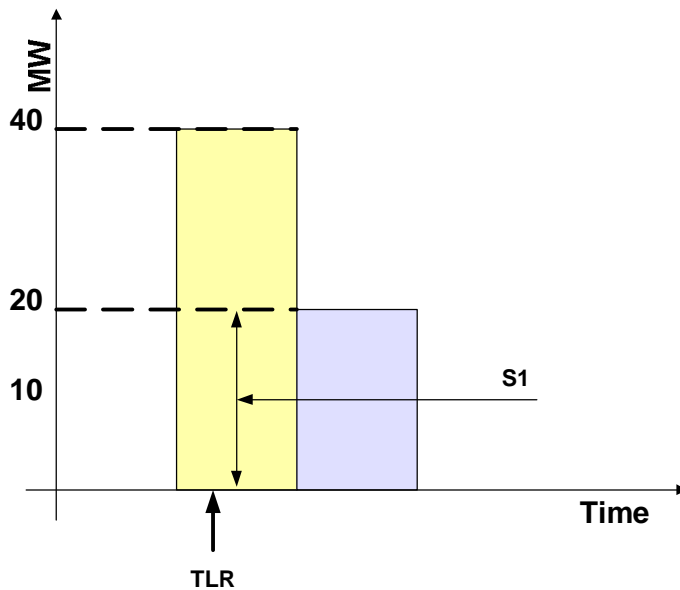
Energy Profile: Current hour	20 MW
Actual flow following curtailment: Current hour	20 MW (no curtailment)
Energy Profile: Next hour	40 MW



<i>Sub-Priority</i>	<i>MW Value</i>	<i>Explanation</i>
S1	20 MW	Maintain current flow (not curtailed)
S2	+0 MW	Reload to <i>lesser</i> of current and next-hour Energy Profile
S3	+20 MW	Next-hour Energy Profile is 40MW
S4		

Example 4 – Transaction not curtailed, next-hour Energy Profile is lower

Energy Profile: Current hour	40 MW
Actual flow following curtailment: Current hour	40 MW (no curtailment)
Energy Profile: Next hour	20 MW

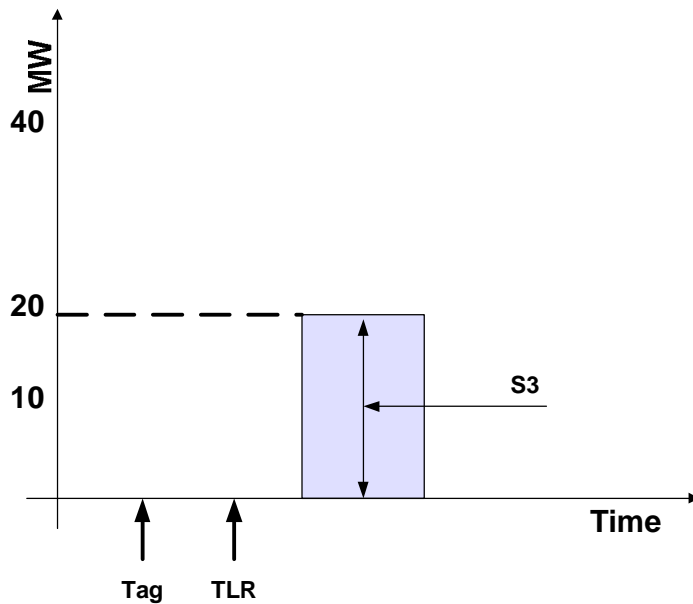


Sub-priorities for Transaction MW:

<i>Sub-Priority</i>	<i>MW Value</i>	<i>Explanation</i>
S1	20 MW	Reduce flow to next-hour Energy Profile (20MW)
S2	+0 MW	Reload to <i>lesser</i> of current and next-hour Energy Profile
S3	+0 MW	Next-hour Energy Profile is 20MW
S4		

Example 5 — TLR Issued before Transaction was scheduled to start

Energy Profile: Current hour	0 MW
Actual flow following curtailment: Current hour	0 MW (Transaction scheduled to start <i>after</i> TLR initiated)
Energy Profile: Next hour	20 MW



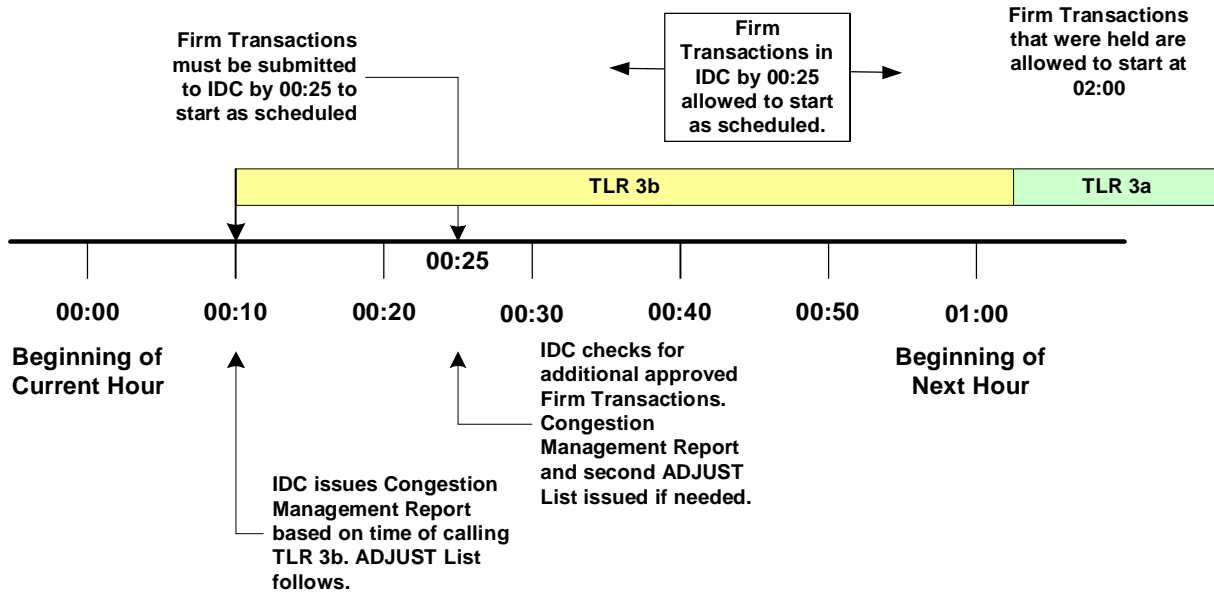
<i>Sub-Priority</i>	<i>MW Value</i>	<i>Explanation</i>
S1	0 MW	Transaction was not allowed to start
S2	+0 MW	Transaction was not allowed to start
S3	+20 MW	Next-hour Energy Profile is 20MW
S4	+0	Tag submitted prior to TLR

Appendix F. Considerations for Interchange Transactions

Using Firm Point-to-Point Transmission Service

The following cases explain the circumstances under which an Interchange Transaction using Firm Point-to-Point Transmission Service will be allowed to start as scheduled during a TLR 3b:

Case 1: TLR 3b is called between 00:00 and 00:25 and the Interchange Transaction using Firm Point-to-Point Transmission Service is submitted to IDC by 00:25.



The IDC will examine the current hour (00) and next hour (01) for all Interchange Transactions.

The IDC will issue an ADJUST List based upon the time the TLR 3b is called. The ADJUST List will include curtailments of Interchange Transactions using Non-firm Point-to-Point Transmission Service as necessary to allow room for those Interchange Transactions using Firm Point-to-Point Transmission Service to start as scheduled.

At 00:25, the IDC will check for additional Interchange Transactions using Firm Point-to-Point Transmission Service that were submitted to the IDC by that time and issue a second ADJUST List if those additional Interchange Transactions are found.

All existing or new Interchange Transactions using Non-firm Point-to-Point Transmission Service that are increasing or expected to start during the current hour or next hour will be placed on HALT or HOLD. There is no Reallocation of lower-priority Interchange Transactions using Non-firm Point-to-Point Transmission Service.

Interchange Transactions using Firm Point-to-Point Transmission Service that were submitted to the IDC by 00:25 will be allowed to start as scheduled.

Standard IRO-006-4.1 — Reliability Coordination — Transmission Loading Relief

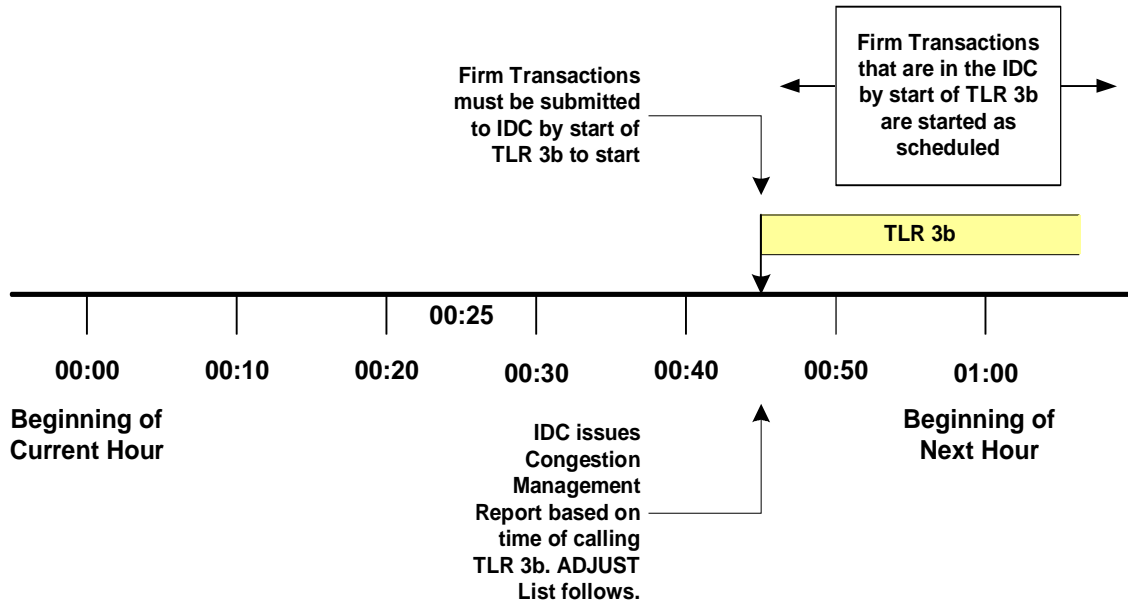
Interchange Transactions using Firm Point-to-Point Transmission Service that were submitted to the IDC after 00:25 will be held.

Once the SOL or IROL violation is mitigated, the Reliability Coordinator shall call a TLR Level 3a (or lower). If a TLR Level 3a is called:

Interchange Transactions using Firm Point-to-Point Transmission Service that were submitted to the IDC by 00:25 will be allowed to start as scheduled at 02:00.

Interchange Transactions using Non-firm Point-to-Point Transmission Service that were held may then be reallocated to start at 02:00.

Case 2: TLR 3b is called after 00:25 and the Interchange Transaction using Firm Point-to-Point Transmission Service is submitted to the IDC no later than the time at which the TLR 3b is called.



The IDC will examine the current hour (00) and next hour (01) for all Interchange Transactions.

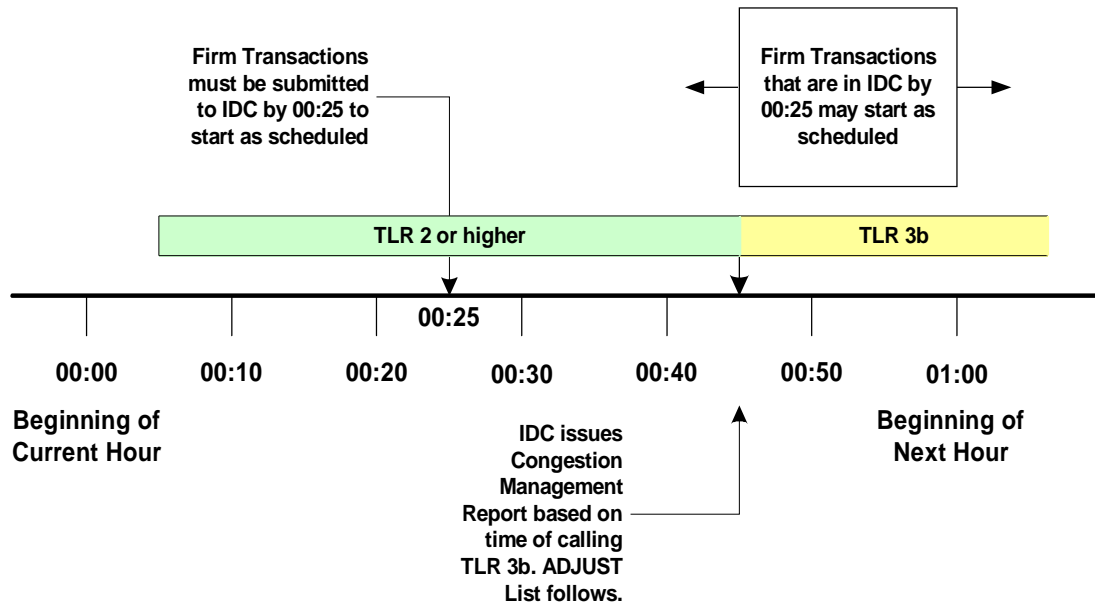
The IDC will issue an ADJUST List at the time the TLR 3b is called. The ADJUST List will include additional curtailments of Interchange Transactions using Non-firm Point-to-Point Transmission Service as necessary to allow room for those Interchange Transactions using Firm Point-to-Point Transmission Service to start at as scheduled.

All existing or new Interchange Transactions using Non-firm Point-to-Point Transmission Service that are increasing or expected to start during the current hour or next hour will be placed on HALT or HOLD. There is no Reallocation of lower-priority Interchange Transactions using Non-firm Point-to-Point Transmission Service.

Interchange Transactions using Firm Point-to-Point Transmission Service that were submitted to the IDC by the time the TLR 3b was called will be allowed to start at as scheduled.

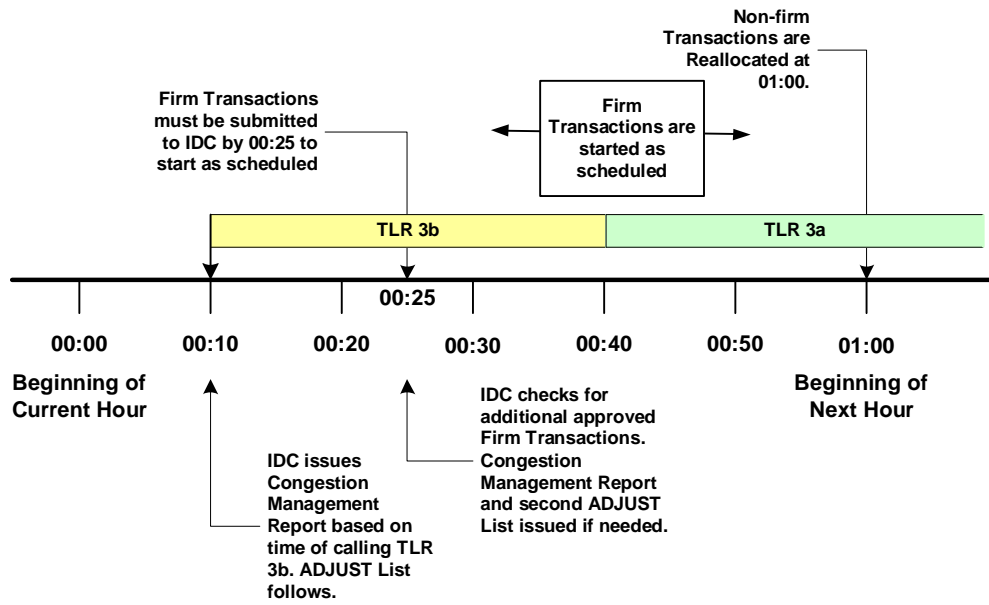
Interchange Transaction using Firm Point-to-Point Transmission Service that were submitted to the IDC after the TLR 3b was called will be held until the next issuance for TLR (either TLR 3b, 3a, or lower level).

Case 3. TLR 2 or higher is in effect, a TLR 3b is called after 00:25, and the Interchange Transaction using Firm Point-to-Point Transmission Service is submitted to the IDC by 00:25.



If a TLR 2 or higher has been issued and 3B is subsequently issued, then only those Interchange Transactions using Firm Point-to-Point Transmission Service that had been submitted to the IDC by 00:25 will be allowed to start as scheduled. All other Interchange Transactions are held.

Case 4. TLR 3b is called before 00:25 and the Interchange Transaction is submitted to the IDC by 00:25. TLR 3a is called at 00:40.

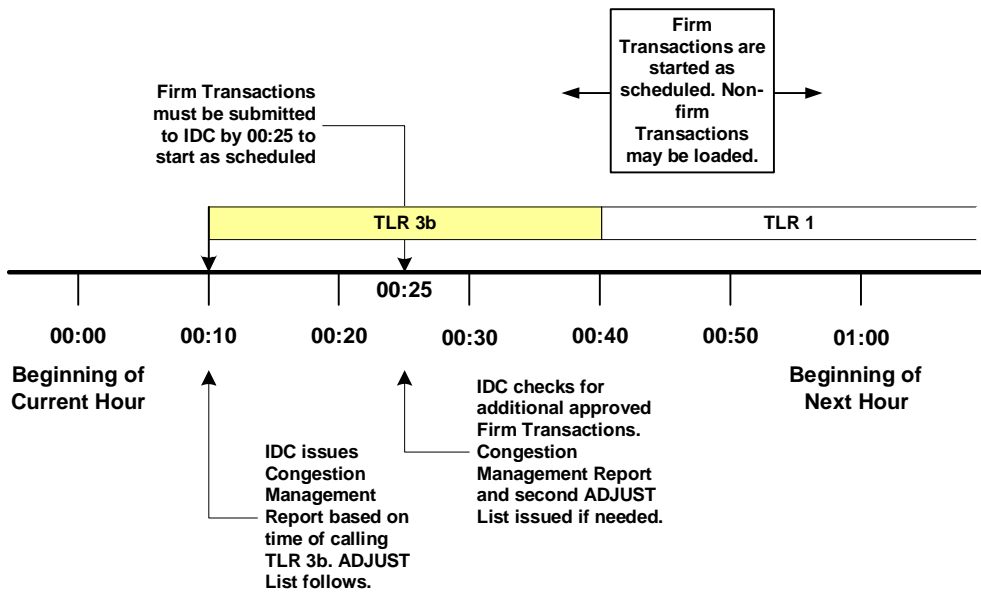


Same as Case 1, but TLR Level 3b ends at 00:40 and becomes TLR Level 3a.

All Interchange Transactions using Firm Point-to-Point Transmission Service will start as scheduled if in by the time the 3A is declared.

All Interchange Transactions using Non-firm Point-to-Point Transmission Service are reallocated at 01:00.

Case 5. TLR 3b is called before 00:25 and the Interchange Transaction is submitted to the IDC by 00:25. TLR 1 is called at 00:40.



Same as Case 1, but TLR Level 3b ends at 00:40 and becomes TLR Level 1.

All Interchange Transactions using Firm Point-to-Point Transmission Service will start as scheduled.

All Interchange Transactions using Non-firm Point-to-Point Transmission Service may be loaded immediately.

A. Introduction

1. **Title:** Reliability Coordination — Transmission Loading Relief (TLR)
2. **Number:** IRO-006-4.1
3. **Purpose:** The purpose of this standard is to provide Interconnection-wide transmission loading relief procedures that can be used to prevent or manage potential or actual SOL and IROL violations to maintain reliability of the Bulk Electric System.
4. **Applicability:**
 - 4.1. Reliability Coordinators.
 - 4.2. Transmission Operators.
 - 4.3. Balancing Authorities.
5. **Proposed Effective Date:** First day of first quarter after BOT adoption.

B. Requirements

R1. A Reliability Coordinator experiencing a potential or actual SOL or IROL violation within its Reliability Coordinator Area shall, with its authority and at its discretion, select one or more procedures to provide transmission loading relief. These procedures can be a “local” (regional, interregional, or sub-regional) transmission loading relief procedure or one of the following Interconnection-wide procedures: [*Violation Risk Factor: Medium*] [*Time Horizon: Real-time Operations*]

This requirement simply states; the RC has the authority to act, the RC should know at what limits he/she needs to act, the RC has pre-identified regional, interregional and sub-regional TLR procedures.

R1.1. The Interconnection-wide Transmission Loading Relief (TLR) procedure for use in the Eastern Interconnection provided in Attachment 1-IRO-006-4. The TLR procedure alone is an inappropriate and ineffective tool to mitigate an IROL violation due to the time required to implement the procedure. Other acceptable and more effective procedures to mitigate actual IROL violations include: reconfiguration, redispatch, or load shedding.

Comment: see FERC Order 693 paragraph 964 regarding recommendation for using tools other than TLR to mitigate an actual IROL.

R1.2. The Interconnection-wide transmission loading relief procedure for use in the Western Interconnection is [the WECC Unscheduled Flow Reduction Procedure provided at: \[http://www.wecc.biz/documents/library/UFAS/UFAS_mitigation_plan_rev_2001-clean_8-8-03.pdf\]\(http://www.wecc.biz/documents/library/UFAS/UFAS_mitigation_plan_rev_2001-clean_8-8-03.pdf\)](#).

~~R1.2 is WECC IRO-STD-006-0 provided at: ftp://www.nere.com/pub/sys/all_updl/standards/rrs/IRO-STD-006-0-17Jan07.pdf~~

R1.3. The Interconnection-wide transmission loading relief procedure for use in ERCOT is provided as Section 7 of the ERCOT Protocols, posted at:

Note: the URL has changed.

<http://www.ercot.com/mktrules/protocols/current.html>

- R2.** The Reliability Coordinator shall only use local transmission loading relief or congestion management procedures to which the Transmission Operator experiencing the potential or actual SOL or IROL violation is a party. [*Violation Risk Factor: Low*] [*Time Horizon: Operations Planning*]
- R3.** Each Reliability Coordinator with a relief obligation from an Interconnection-wide procedure shall follow the curtailments as directed by the Interconnection-wide procedure. A Reliability Coordinator desiring to use a local procedure as a substitute for curtailments as directed by the Interconnection-wide procedure shall obtain prior approval of the local procedure from the ERO. [*Violation Risk Factor: Low*] [*Time Horizon: Operations Planning*]
- R4.** When Interconnection-wide procedures are implemented to curtail Interchange Transactions that cross an Interconnection boundary, each Reliability Coordinator shall comply with the provisions of the Interconnection-wide procedure. [*Violation Risk Factor: Medium*] [*Time Horizon: Real-time Operations*]
- R5.** During the implementation of relief procedures, and up to the point that emergency action is necessary, Reliability Coordinators and Balancing Authorities shall comply with applicable Interchange scheduling standards. [*Violation Risk Factor: Medium*] [*Time Horizon: Real-time Operations*]

Comment: R5 will be reviewed during Phase 3 of the TLR drafting team work. See white paper for explanation of the three phases of changes to this standard.

C. Measures

- M1.** Each Reliability Coordinator shall be capable of providing evidence (such as logs) that demonstrate when Eastern Interconnection, WECC, or ERCOT Interconnection-wide transmission loading relief procedures are implemented, the implementation follows the respective established procedure as specified in this standard (R1, R1.1, R1.2 and R1.3).
- M2.** Each Reliability Coordinator shall be capable of providing evidence (such as written documentation) that the Transmission Operator experiencing the potential or existing SOL or IROL violations is a party to the local transmission loading relief or congestion management procedures when these procedures have been implemented (R2).
- M3.** Each Reliability Coordinator shall be capable of providing evidence (such as NERC meeting minutes) that the local procedure has received prior approval by the ERO when such procedure is used as a substitute for curtailment as directed by the Interconnection-wide procedure (R3).
- M4.** Each Reliability Coordinator shall be capable of providing evidence (such as logs) that the responding Reliability Coordinator complied with the provisions of the Interconnection-wide procedure as requested by the initiating Reliability Coordinator when requested to curtail an Interchange Transaction that crosses an Interconnection boundary (R4).

- M5.** Each Reliability Coordinator and Balancing Authority shall be capable of providing evidence (such as Interchange Transaction Tags, operator logs, voice recordings or transcripts of voice recordings, electronic communications, computer printouts) that they have complied with applicable Interchange scheduling standards INT-001, INT-003, and INT-004 during the implementation of relief procedures, up to the point emergency action is necessary (R5).

D. Compliance

1. Compliance Monitoring Process

1.1. Compliance Monitoring Responsibility

Regional Entity.

1.2. Compliance Monitoring Period and Reset Time Frame

Compliance Monitoring Period: One calendar year.

Reset Period: One month without a violation.

1.3. Data Retention

The Reliability Coordinator shall maintain evidence for eighteen months for M1, M4, and M5.

The Reliability Coordinator shall maintain evidence for the duration the Transmission Operator is party to the procedure in effect plus one calendar year thereafter for M2.

The Reliability Coordinator shall maintain evidence for the approved duration of the procedure in effect plus one calendar year thereafter for M3.

1.4. Additional Compliance Information

Each Reliability Coordinator and Balancing Authority shall demonstrate compliance through self-certification submitted to its Compliance Monitor annually and reporting by exception. The Compliance Monitor may also use scheduled on-site reviews every three years, and investigations upon complaint, to assess performance.

Each Reliability Coordinator and Balancing Authority shall have the following available for its Compliance Monitor to inspect during a scheduled, on-site review or within 5 days of a request as part of an investigation upon complaint:

1.4.1 Operations logs, voice recordings or transcripts of voice recordings or other documentation providing the evidence of its compliance to all the requirements for all Interconnection-wide TLR procedures that it has implemented during the review period.

1.4.2 TLR reports.

2. Violation Severity Levels

2.1. Lower. There shall be a lower violation severity level if any of the following conditions exist:

- 2.1.1 For each TLR in the Eastern Interconnection, the Reliability Coordinator violates one (1) requirement of the applicable Interconnection-wide procedure (R1)
 - 2.1.2 The Reliability Coordinators or Balancing Authorities did not comply with applicable Interchange scheduling standards during the implementation of the relief procedures, up to the point emergency action is necessary (R5).
 - 2.1.3 When requested to curtail an Interchange Transaction that crosses an Interconnection boundary utilizing an Interconnection-wide procedure, the responding Reliability Coordinator did not comply with the provisions of the Interconnection-wide procedure as requested by the initiating Reliability Coordinator (R4).
- 2.2. Moderate. There shall be a moderate violation severity level if any of the following conditions exist:**
- 2.2.1 For each TLR in the Eastern Interconnection, the Reliability Coordinator violated two (2) to three (3) requirements of the applicable Interconnection-wide procedure (R1).
- 2.3. High. There shall be a high violation severity level if any of the following conditions exist:**
- 2.3.1 For each TLR in the Eastern Interconnection, the applicable Reliability Coordinator violated four (4) to five (5) requirements of the applicable Interconnection-wide procedure (R1).
- 2.4. Severe. There shall be a severe violation severity level if any of the following conditions exist:**
- 2.4.1 For each TLR in the Eastern Interconnection, the Reliability Coordinator violated six (6) or more of the requirements of the applicable Interconnection-wide procedure (R1).
 - 2.4.2 A Reliability Coordinator implemented local transmission loading relief or congestion management procedures to relieve congestion but the Transmission Operator experiencing the congestion was not a party to those procedures (R2).
 - 2.4.3 A Reliability Coordinator implemented local transmission loading relief or congestion management procedures as a substitute for curtailment as directed by the Interconnection-wide procedure but the local procedure had not received prior approval from the ERO (R3).
 - 2.4.4 While attempting to mitigate an existing IROL violation in the Eastern Interconnection, the Reliability Coordinator applied TLR as the sole remedy for an existing IROL violation.
 - 2.4.5 While attempting to mitigate an existing constraint in the Western Interconnection using the “WSCC Unscheduled Flow Mitigation Plan”, the Reliability Coordinator did not follow the procedure correctly.

- 2.4.6** While attempting to mitigate an existing constraint in ERCOT using Section 7 of the ERCOT Protocols, the Reliability Coordinator did not follow the procedure correctly.

E. Regional Differences

1. [PJM/MISO Enhanced Congestion Management](#) (Curtailment/Reload/Reallocation) Waiver approved March 25, 2004. To be retired upon completion of the field test, and in the interim the Regional Difference will be contained in both the NERC and NAESB standards.

This section on Regional Differences is highlighted for transfer to NAESB following completion of the MISO/PJM/SPP field test as described in the white paper.

2. Southwest Power Pool (SPP) Regional Difference – Enhanced Congestion Management (Curtailment/Reload/Reallocation). The SPP regional difference, which is equivalent to the PJM/MISO waiver, shall apply within the SPP region as follows:

This regional difference impacts actions on behalf of those SPP Balancing Authorities that are participating in the SPP market. This regional difference does not impact those Balancing Authorities for which SPP will continue to act as the Reliability Coordinator but that are not participating in the SPP market.

SPP shall calculate the impacts of SPP market flow on all facilities included in SPP's Coordinated Flowgate List. SPP shall conduct sensitivity studies to determine which external flowgates (outside SPP's footprint) are significantly impacted by the market flows of SPP's control zones (currently the balancing areas that exist today in the IDC). SPP shall perform studies to determine which external flowgates SPP will monitor and help control. An external flowgate selected by one of the studies will be considered a Coordinated Flowgate (CF).

In its calculation, SPP shall consider market flow impacts as the impacts of energy dispatched by the SPP market and self-dispatched energy serving load in the market footprint, but not tagged. SPP shall use a method equivalent to the PJM/MISO Market Flow Calculation methodology identified in the PJM/MISO waiver. Impacts of tagged transactions representing delivery of energy not dispatched by the SPP market and energy dispatched by the market but delivered outside the footprint will not be included in market flow.

SPP shall separate the market flow impacts for current hour and next hour into their appropriate priorities and shall provide those market flow impacts to the IDC. The market flows will be represented in the IDC and made available for curtailment under the appropriate TLR Levels. The market flow impacts will not be represented by conventional interchange transaction tags.

The SPP method will impact the following sections of the TLR Procedure:

Network and Native Load (NNL) Calculations — The SPP regional difference modifies Attachment 1-IRO-006-1 Section 5 “Parallel Flow Calculation Procedure for Reallocating or Curtailing Firm Transmission Service” within the SPP region.

Section 5 of Attachment 1-IRO-006-1 requires that the “Per Generator Method without Counter Flow” methodology be utilized to calculate the portion of parallel flows on any Constrained Facility due to Network Integration (NI) transmission service and service to Native Load (NL) of each balancing authority.

SPP shall use a “Market Flow Calculation” methodology to calculate the portion of parallel flows on all facilities included in the RTO’s “Coordinated Flowgate List” due to NI service or service to NL of each balancing authority.

The Market Flow Calculation differs from the Per Generator Method in the following ways:

- The contribution from all market area generators will be taken into account.
- In the Per Generator Method, only generators having a GLDF greater than 5% are included in the calculation. Additionally, generators are included only when the sum of the maximum generating capacity at a bus is greater than 20 MW. The market flow calculations will use all positively impacting flows down to 0% with no threshold. Counter flows will not be included in the market flow calculation.
- The contribution of all market area generators is based on the present output level of each individual unit.
- The contribution of the market area load is based on the present demand at each individual bus.

By expanding on the Per Generator Method, the market flow calculation evolves into a methodology very similar to the “Per Generator Method” method, while providing increased Interchange Distribution Calculator (IDC) granularity. Counter flows are also calculated and tracked in order to account for and recognize that the either the positive market flows may be reduced or counter flows may be increased to provide appropriate relief on a flowgate.

These NNL values will be provided to the IDC to be included and represented with the calculated NNL values of other Balancing Authorities for the purposes of identifying and obtaining required NNL relief across a flowgate in congestion under a TLR Level 5A/5B.

Pro Rata Curtailment of Non-Firm Market Flow Impacts — The SPP regional difference modifies Attachment 1-IRO-006-1 Appendix B “Transaction Curtailment Formula” within the SPP region.

Appendix B “Transaction Curtailment Formula” details the formula used to apply a weighted impact to each non-firm tagged Interchange Transaction (Priorities 1 thru 6) for the purposes of Curtailment by the IDC. For the purpose of Curtailment, the non-firm market flow impacts (Priorities 2 and 6) submitted to the IDC by SPP should be curtailed pro-rata as is done for Interchange Transaction using firm transmission service. This is because several of the values needed to assign a weighted impact using the process listed in Appendix B will not be available:

- Distribution Factor (no tag to calculate this value from)
- Impact on Interface value (cannot be calculated without Distribution Factor)
- Impact Weighting Factor (cannot be calculated without Distribution Factor)
- Weighted Maximum Interface Reduction (cannot be calculated without Distribution Factor)

- Interface Reduction (cannot be calculated without Distribution Factor)
- Transaction Reduction (cannot be calculated without Distribution Factor)

While the non-firm market flow impacts submitted to the IDC are to be curtailed pro rata, the impacting non-firm tagged Interchange Transactions could still use the existing processes to assign the weighted impact value.

Assignment of Sub-Priorities — The SPP regional difference modifies Attachment 1-IRO-006-1 Appendix E “How the IDC Handles Reallocation”, Section E2 “Timing Requirements”, within the SPP region.

Under the header “IDC Calculations and Reporting” in Section E2 of Appendix E to Attachment 1-IRO-006-1, the following requirement exists: “In a TLR Level 3a the Interchange Transactions using Non-firm Transmission Service in a given priority will be further divided into four sub-priorities, based on current schedule, current active schedule (identified by the submittal of a tag ADJUST message), next-hour schedule, and tag status. Solely for the purpose of identifying which Interchange Transactions to be loaded under a TLR 3a, various MW levels of an Interchange Transaction may be in different sub-priorities. The sub-priorities are shown in the following table:

Priority	Purpose	Explanation and Conditions
S1	To allow a flowing Interchange Transaction to maintain or reduce its current MW amount in accordance with its energy profile.	The MW amount is the lowest between currently flowing MW amount and the next-hour schedule. The currently flowing MW amount is determined by the e-tag ENERGY PROFILE and ADJUST tables. If the calculated amount is negative, zero is used instead.
S2	To allow a flowing Interchange Transaction that has been curtailed or halted by TLR to reload to the lesser of its current-hour MW amount or next-hour schedule in accordance with its energy profile.	The Interchange Transaction MW amount used is determined through the e-tag ENERGY PROFILE and ADJUST tables. If the calculated amount is negative, zero is used instead.
S3	To allow a flowing Transaction to increase from its current-hour schedule to its next-hour schedule in accordance with its energy profile.	The MW amounts used in this sub-priority is determined by the e-tag ENERGY PROFILE table. If the calculated amount is negative, zero is used instead.
S4	To allow a Transaction that had never started and was submitted to the Tag Authority after the TLR (level 2 or higher) has been declared	The Transaction would not be allowed to start until all other Interchange Transactions submitted prior to the TLR with the same

	to begin flowing (i.e., the Interchange Transaction never had an active MW and was submitted to the IDC after the first TLR Action of the TLR Event had been declared.)	priority have been (re)loaded. The MW amount used is the sub-priority is the next-hour schedule determined by the e-tag ENERGY PROFILE table.
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SPP shall use a “Market Flow Calculation” methodology to calculate the amount of energy flowing across all facilities included in the RTO’s “Coordinated Flowgate List” that is associated with the operation of the SPP market. This energy is identified as “market flow.”

These market flow impacts for current hour and next hour will be separated into their appropriate priorities and provided to the IDC by SPP. The market flows will then be represented and made available for curtailment under the appropriate TLR Levels.

Even though these market flow impacts (separated into appropriate priorities) will not be represented by conventional “tags,” the impacts and their desired levels will still be provided to the IDC for current hour and next hour. Therefore, for the purposes of reallocation, a sub-priority (S1 thru S4) should be assigned to these market flow impacts by the NERC IDC as follows, using comparable logic as would be used if the impacts were in fact tagged transactions.

Priority	Purpose	Explanation and Conditions
S1	To allow existing market flow to maintain or reduce its current MW amount.	The currently flowing MW amount is the amount of market flow existing after the RTO has recognized the constraint for which TLR has been called. If the calculated amount is negative, zero is used instead.
S2	To allow market flow that has been curtailed or halted by TLR to reload to its desired amount for the current-hour.	This is the difference between the current hour unconstrained market flow and the current market flow. If the current-hour unconstrained market flow is not available, the IDC will use the most recent market flow since the TLR was first issued or, if not available, the market flow at the time the TLR was first issued.
S3	To allow a market flow to increase to its next-hour desired amount.	This is the difference between the next hour and current hour unconstrained market flow.

To be retired upon completion of the field test, and in the interim the Regional Difference will be contained in both the NERC and NAESB standards.

F. Associated Documents

Version History

Version	Date	Action	Change Tracking
0	April 1, 2005	Effective Date	New
0	August 8, 2005	Removed “Proposed” from Effective Date	Errata
1	August 8, 2005	Revised Attachment 1	Revision
3	February 26, 2007	Revised Purpose and Attachment 1 related to NERC NAESB split of the TLR procedure	Revision
4	October 23, 2007	Approved by Board of Trustees	Revision
4.1	April 15, 2009	The URL in R1.2. was corrected.	Errata

PLEASE NOTE: items designated for inclusion in the NAESB TLR business practice following completion of the standard revision were deleted. Please see the mapped document to see which items were move to NAESB and what future changes are expected.

Attachment 1 — IRO-006

Transmission Loading Relief Procedure — Eastern Interconnection

Purpose

This standard defines procedures for curtailment and reloading of Interchange Transactions to relieve overloads on transmission facilities modeled in the Interchange Distribution Calculator.

Applicability

This standard only applies to the Eastern Interconnection.

1. Transmission Loading Relief (TLR) Procedure

- 1.1. Initiation only by Reliability Coordinator.** A Reliability Coordinator shall be the only entity authorized to initiate the TLR Procedure.

The flexibility for ISOs and RTOs to use redispatch is contained explicitly in the NAESB business practice Section 1.3.

- 1.1.1. Requesting relief on transmission facilities.** Any Transmission Operator may request from its Reliability Coordinator relief on the transmission facilities it operates. A Reliability Coordinator shall review these requests for relief and determine the appropriate relief actions.

- 1.2. Mitigating SOL and IROL violations.** A Reliability Coordinator may utilize the TLR Procedure to mitigate potential or existing System Operating Limit (SOL) violations or to prevent or mitigate Interconnection Reliability Operating Limit (IROL) violations on any transmission facility modeled in the IDC. However, the TLR procedure is an inappropriate and ineffective tool as a sole means to mitigate existing IROL violations due to the time required to implement the procedure. Reconfiguration, redispatch, and load shedding are more timely and effective in mitigating existing IROL violations

- 1.3. Sequencing of TLR Levels and taking emergency action.** The Reliability Coordinator shall not be required to follow the TLR Levels in their numerical sequence (Section 2, “TLR Levels”). Furthermore, if a Reliability Coordinator deems that a transmission loading condition could jeopardize Bulk Electric System reliability, the Reliability Coordinator shall have the authority to enter TLR Level 6 directly, and immediately direct the Balancing Authorities or Transmission Operators to take such actions as redispatching generation, or reconfiguring transmission, or reducing load to mitigate the critical condition until Interchange Transactions can be reduced utilizing the TLR Procedure or other methods to return the system to a secure state.

- 1.4. Notification of TLR Procedure implementation.** The Reliability Coordinator initiating the use of the TLR

This notification is automated in the Interchange Distribution Calculator (IDC) and populates a message on the NERC RCIS.

Procedure shall notify other Reliability Coordinators and Balancing Authorities and Transmission Operators, and must post the initiation and progress of the TLR event on the appropriate NERC web page(s).

1.4.1. Notifying other Reliability Coordinators. The Reliability Coordinator initiating the TLR Procedure shall inform all other Reliability Coordinators via the Reliability Coordinator Information System (RCIS) that the TLR Procedure has been implemented.

Actions expected. The Reliability Coordinator initiating the TLR Procedure shall indicate the actions expected to be taken by other Reliability Coordinators.

1.4.2. Notifying Transmission Operators and Balancing Authorities. The Reliability Coordinator shall notify Transmission Operators and Balancing Authorities in its Reliability Area when entering and leaving any TLR level.

1.4.3. Notifying Sink Balancing Authorities. The Reliability Coordinator for the sink Balancing Authority shall be responsible for directing the Sink Balancing Authority to curtail the Interchange Transactions as specified by the Reliability Coordinator implementing the TLR Procedure.

This notification is automated in the Interchange Distribution Calculator (IDC) and populates a message on the NERC RCIS.

Notification order. Within a Transmission Service Priority level, the Sink Balancing Authorities whose Interchange Transactions have the largest impact on the Constrained Facilities shall be notified first if practicable.

1.4.4. Updates. At least once each hour, or when conditions change, the Reliability Coordinator implementing the TLR Procedure shall update all other Reliability Coordinators (via the RCIS). Transmission Operators and Balancing Authorities who have had Interchange Transactions impacted by the TLR will be updated by their Reliability Coordinator.

1.5. Obligations. All Reliability Coordinators shall comply with the request of the Reliability Coordinator who initiated the TLR Procedure, unless the initiating Reliability Coordinator agrees otherwise.

1.6. Consideration of Interchange Transactions. The administration of the TLR Procedure shall be guided by information obtained from the IDC.

1.6.1. Interchange Transactions not in the IDC. Reliability Coordinators shall also treat known Interchange Transactions that may not appear in the IDC in accordance with the procedures in this document.

1.6.2. Transmission elements not in IDC. When a Reliability Coordinator is faced with an overload on a transmission element that is not modeled in the IDC, the Reliability Coordinator shall use the best information available to curtail Interchange Transactions in order to operate the system in a reliable manner. The Reliability Coordinator shall use its best efforts to ensure that Interchange Transactions with a Transfer Distribution Factor

of less than the Curtailment Threshold on the transmission element not modeled in the IDC are not curtailed.

1.6.3. Questionable IDC results. Any Reliability Coordinator who believes the curtailment list from the IDC for a particular TLR event is incorrect shall use its best efforts to communicate those adjustments necessary to bring the curtailment list into conformance with the principles of this Procedure to the initiating Reliability Coordinator. Causes of questionable IDC results may include:

- Missing Interchange Transactions that are known to contribute to the Constraint.
- Significant change in transmission system topology.
- TDF matrix error.

Impacts of questionable IDC results may include:

- Curtailment that would have no effect on, or aggravate the constraint.
- Curtailment that would initiate a constraint elsewhere.

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

1.6.4. Curtailment that would cause a constraint elsewhere. A Reliability Coordinator shall be allowed to exempt an Interchange Transaction from Curtailment if that Reliability Coordinator is aware that the Interchange Transaction Curtailment directed by the IDC would cause a constraint to occur elsewhere. This exemption shall only be allowed after the Reliability Coordinator has consulted with the Reliability Coordinator who initiated the Curtailment.

1.7 Logging. The Reliability Coordinator shall complete the NERC Transmission Loading Relief Procedure Log whenever it invokes TLR Level 2 or above, and send a copy of the log via email to NERC within two business days of the TLR event for posting on the NERC website.

Creation and distribution of the TLR Procedure Log is now automated in the IDC.

1.8 TLR Event Review. The Reliability Coordinator shall report the TLR event to the Operating Reliability Subcommittee in accordance with TLR review processes established by NERC as required.

1.8.1 Providing information. Transmission Operators and Balancing Authorities within the Reliability Coordinator's Area, and all other Reliability Coordinators, including Transmission Operators and Balancing Authorities within their respective Reliability Areas, shall provide information, as requested by the initiating Reliability Coordinator, in accordance with TLR review processes established by NERC.

1.8.2 Market Committee reviews. The Market Committee may conduct reviews of certain TLR events based on the size and number of Interchange Transactions that are affected, the frequency that the TLR Procedure is called for a particular Constrained Facility, or other factors.

The Market Committee no longer exists and this requirement will be removed in Phase 3.

1.8.3 Operating Reliability Subcommittee reviews. The Operating Reliability Subcommittee shall conduct reviews to ensure proper implementation and for “lessons learned.”

2. Transmission Loading Relief (TLR) Levels

Introduction

This section describes the various levels of the TLR Procedure. The description of each level begins with the circumstances that define the TLR Level, followed by the procedures to be followed.

The decision that a Reliability Coordinator makes in selecting a particular TLR Level often depends on the transmission loading condition and whether the Interchange Transaction is using Non-firm Point-to-Point Transmission Service or Firm Point-to-Point Transmission Service. There are further considerations that depend on whether the Constrained Facility is on or off the Contract Path. It is important to note that an Interchange Transaction using Firm Point-to-Point Transmission Service on all Contract Path links is considered a “firm” Interchange Transaction even if the Constrained Facility is off the Contract Path.

2.1. TLR Level 1 — Notify Reliability Coordinators of potential SOL or IROL Violations

2.1.1. The Reliability Coordinator shall use the following circumstances to establish the need for TLR Level 1:

- The transmission system is secure.
- The Reliability Coordinator foresees a transmission or generation contingency or other operating problem within its Reliability Area that could cause one or more transmission facilities to approach or exceed their SOL or IROL.

2.1.2. **Notification procedures.** The Reliability Coordinator shall notify all Reliability Coordinators via the Reliability Coordinator Information System (RCIS) as soon as the condition is foreseen. All affected Reliability Coordinators shall check to ensure that Interchange Transactions are posted in the IDC.

2.2. TLR Level 2 — Hold transfers at present level to prevent SOL or IROL Violations

2.2.1. The Reliability Coordinator shall use the following circumstances to establish the need for entering TLR Level 2:

- The transmission system is secure.
- One or more transmission facilities are expected to approach, or are approaching, or are at their SOL or IROL.

2.3 TLR Level 3a — Reallocation of Transmission Service by curtailing Interchange Transactions using Non-firm Point-to-Point Transmission Service to allow Interchange Transactions using higher priority Transmission Service

2.3.1. The Reliability Coordinator shall use the following circumstances to establish the need for entering TLR Level 3a:

- The transmission system is secure.
- One or more transmission facilities are expected to approach, or are approaching, or are at their SOL or IROL.
- Transactions using Non-firm Point-to-Point Transmission Service are flowing that are at or above the Curtailment Threshold on those facilities.
- The Transmission Provider has previously approved a higher priority Point-to-Point Transmission Service reservation over which a Transmission Customer wishes to begin an Interchange Transaction.

2.4. TLR Level 3b — Curtail Interchange Transactions using Non-Firm Transmission Service Arrangements to mitigate a SOL or IROL Violation

2.4.1. The Reliability Coordinator shall use the following circumstances to establish the need for entering TLR Level 3b:

- One or more transmission facilities are operating above their SOL or IROL, or
- Such operation is imminent and it is expected that facilities will exceed their reliability limit unless corrective action is taken, or
- One or more Transmission Facilities will exceed their SOL or IROL upon the removal from service of a generating unit or another transmission facility.
- Transactions using Non-firm Point-to-Point Transmission Service are flowing that are at or above the Curtailment Threshold on those facilities.

2.5 TLR Level 4 — Reconfigure Transmission

2.5.1. The Reliability Coordinator shall use the following circumstances to establish the need for entering TLR Level 4:

- One or more Transmission Facilities are above their SOL or IROL, or
- Such operation is imminent and it is expected that facilities will exceed their reliability limit unless corrective action is taken.

2.5.2. Reconfiguration procedures. The issuance of a TLR Level 4 shall result in the curtailment, in the current hour and the next hour, of all Interchange Transactions using Non-firm Point-to-Point Transmission Service that are at or above the Curtailment Threshold that impact the Constrained

Facilities. If a SOL or IROL violation is imminent or occurring, the Reliability Coordinator(s) shall request that the affected Transmission Operators reconfigure transmission on their system, or arrange for reconfiguration on other transmission systems, to mitigate the constraint.

2.6. TLR Level 5a — Reallocation of Transmission Service by curtailing Interchange Transactions using Firm Point-to-Point Transmission Service on a pro rata basis to allow additional Interchange Transactions using Firm Point-to-Point Transmission Service

2.6.1. The Reliability Coordinator shall use the following circumstances to establish the need for entering TLR Level 5a:

- The transmission system is secure.
- One or more transmission facilities are at their SOL or IROL.
- All Interchange Transactions using Non-firm Point-to-Point Transmission Service that are at or above the Curtailment Threshold have been curtailed.
- The Transmission Provider has been requested to begin an Interchange Transaction using previously arranged Firm Transmission Service that would result in a SOL or IROL violation.
- No further transmission reconfiguration is possible or effective.

2.7. TLR Level 5b — Curtail Interchange Transactions using Firm Point-to-Point Transmission Service to mitigate an SOL or IROL violation

2.7.1. The Reliability Coordinator shall use following circumstances to establish the need for entering TLR Level 5b:

- One or more Transmission Facilities are operating above their SOL or IROL, or
- Such operation is imminent, or
- One or more Transmission Facilities will exceed their SOL or IROL upon the removal from service of a generating unit or another transmission facility.
- All Interchange Transactions using Non-firm Point-to-Point Transmission Service that are at or above the Curtailment Threshold have been curtailed.
- No further transmission reconfiguration is possible or effective.

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2.8. Curtailment of Interchange Transactions Using Firm Transmission Service

2.8.1. The Reliability Coordinator shall direct the curtailment of Interchange Transactions using Firm Transmission Service that are at or above the Curtailment Threshold for the following TLR Levels:

2.8.1.1. TLR Level 5a. Enable additional Interchange Transactions using Firm Point-to-Point Transmission Service to be implemented after all Interchange Transactions using Non-firm Point-to-Point Service have been curtailed, or

2.8.1.2. TLR Level 5b. Mitigate a SOL or IROL violation that remains after all Interchange Transactions using Non-firm Transmission Service has been curtailed under TLR Level 3b, and following attempts to reconfigure transmission under TLR Level 4.

2.9. TLR Level 6 — Emergency Procedures

2.9.1 The Reliability Coordinator shall use following circumstances to establish the need for entering TLR Level 6:

- One or more Transmission Facilities are above their SOL or IROL.
- One or more Transmission Facilities will exceed their SOL or IROL upon the removal from service of a generating unit or another transmission facility.

2.9.2 Implementing emergency procedures. If the Reliability Coordinator deems that transmission loading is critical to Bulk Electric System reliability, the Reliability Coordinator shall immediately direct the Balancing Authorities and Transmission Operators in its Reliability Area to redispatch generation, or reconfigure transmission, or reduce load to mitigate the critical condition until Interchange Transactions can be reduced utilizing the TLR Procedures or other procedures to return the system to a secure state. All Balancing Authorities and Transmission Operators shall comply with all requests from their Reliability Coordinator.

2.10 TLR Level 0 — TLR concluded

2.10.1 Interchange Transaction restoration and notification procedures. The Reliability Coordinator initiating the TLR Procedure shall notify all Reliability Coordinators within the Interconnection via the RCIS when the SOL or IROL violations are mitigated and the system is in a reliable state, allowing Interchange Transactions to be reestablished at its discretion. Those with the highest transmission priorities shall be reestablished first if possible.

3. Requirements

3.1 The Reliability Coordinator shall be allowed to call a TLR 3b at any time to help mitigate a SOL or IROL violation.

- 3.2** The Reliability Coordinator shall Reallocate Interchange Transactions using Non-firm Point-to-Point Transmission for the next hour to maintain the desired flow using Reallocation in accordance with the following timing specification:
- 3.2.1** If issued prior to XX: 25, Non-firm Interchange Transactions will be curtailed to meet the desired current hour relief
 - 4.2.1.1** At XX: 25 a Reallocation will be performed to maintain the desired flow at the top of the following hour
 - 3.2.2** If issued after XX: 25, Non firm Interchange Transactions will be curtailed to meet the desired current hour relief and a Reallocation will be performed to maintain the target flow identified for the current hour.
 - 3.2.3** Transactions must be in the IDC by the Approved-tag Submission Deadline for Reallocation.
- 3.3** The IDC shall issue ADJUST Lists to the Generation and Load Balancing Authority Areas and the Purchasing-Selling Entity who submitted the tag. The ADJUST List will include: (recommended to be moved to Attachment 2)
- 3.3.1** Interchange Transactions using Non-firm Point-to-Point Transmission Service that are to be curtailed or held during current and next hours. (recommended to be moved to Attachment 2)
 - 3.3.2** Interchange Transactions using Firm Point-to-Point Transmission Service that were entered after XX:25 or issuance of TLR 3b (see Case 3 in Appendix F). (recommended to be moved to Attachment 2)
- 3.4** The Sink Balancing Authority shall send the ADJUST Lists back to the IDC as soon as possible to ensure the most accurate calculations for actions subsequent to the TLR 3b being called. (recommend to be moved to Attachment 2)
- 3.5** The Reliability Coordinator will no longer be required to call a TLR Level 3a as soon as the SOL or IROL violation that caused the TLR 3b to be called has been mitigated due to the inherent next hour Reallocation that takes place for the top of the next hour in the TLR Level 3b. (recommend to be moved to Attachment 2)

Appendices for Transmission Loading Relief Standard

PLEASE NOTE: items designated for inclusion in the NAESB TLR business practice following completion of the standard revision were deleted from this version of the NERC standard. Please see the mapped document to see which requirements were moved to NAESB and what future changes are expected. Appendices B, D, G, and the sub-priority portions of E-2 have been moved to NAESB, The appendices below (A, C, E, F) will be renumbered in the final standard.

Appendix A. Transaction Management and Curtailment Process.

Appendix C. Sample NERC Transmission Loading Relief Procedure Log.

Appendix E. How the IDC Handles Reallocation.

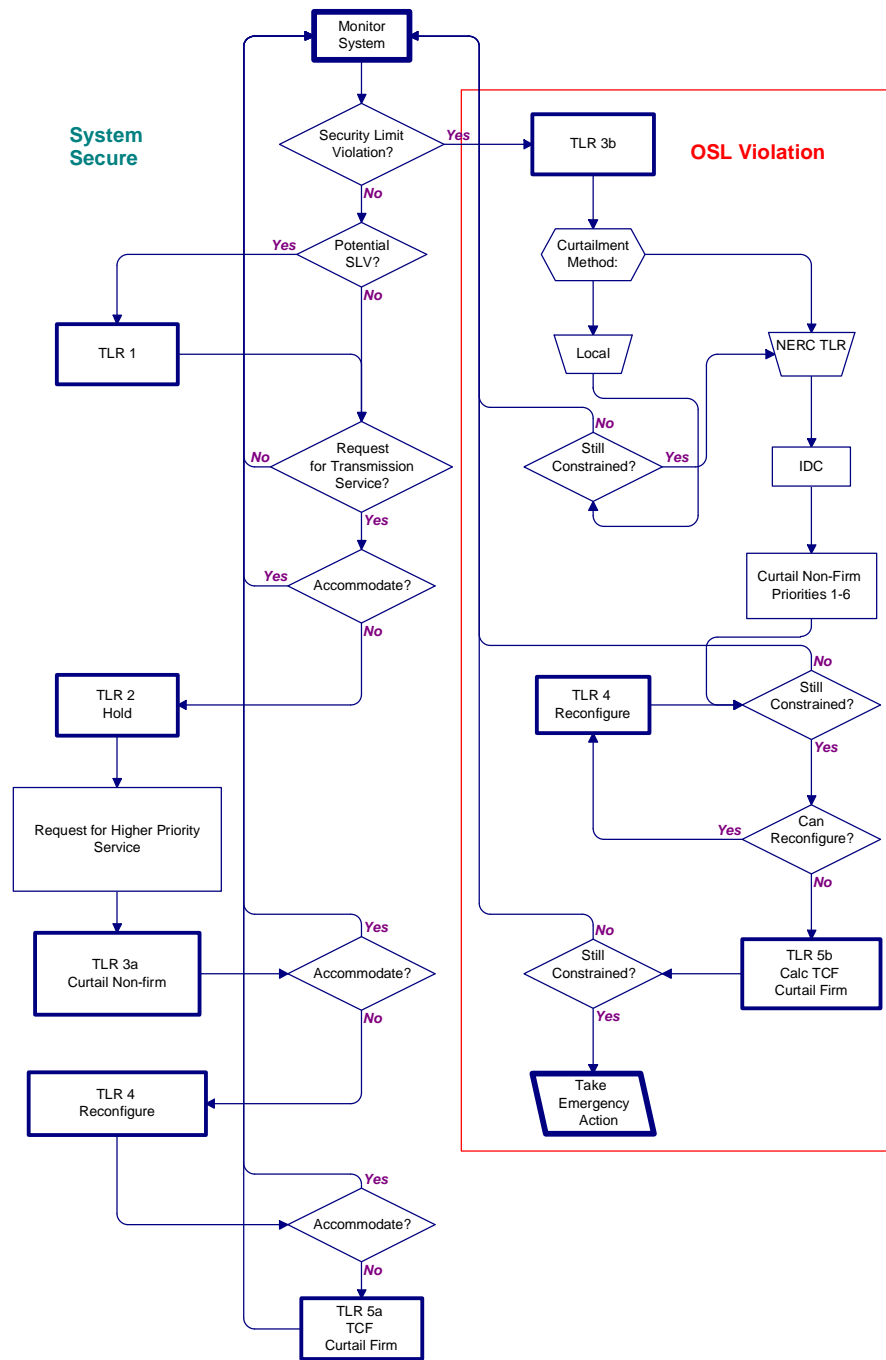
Section E1: Summary of IDC Features that Support Transaction Reloading/Reallocation.

Section E2: Timing Requirements.

Appendix F. Considerations for Interchange Transactions using Firm Point-to-Point Transmission Service.

Appendix A. Transaction Management and Curtailment Process

This flowchart depicts an overview of the Transaction Management and Curtailment process. Detailed decisions are not shown.



Appendix E. How the IDC Handles Reallocation

The IDC algorithms reflect the Reallocation and reloading principles in this Appendix, as well as the reporting requirements, and status display. The IDC will obtain the Tag Submittal Time from the Tag Authority and post the Reloading/Reallocation information to the NERC TLR website.

A summary of IDC features that support the Reallocation process is provided in Attachment E1. Details on the interface and display features are provided in Attachment E2. Refer to Version 1.7.095 NERC Transaction Information Systems Working Group (TISWG) *Electronic Tagging Functional Specification* for details about the E-Tag system.

E1. Summary of IDC Features that Support Transaction Reloading/Reallocation

The following is a summary of IDC features and E-Tag interface that support Reloading/Reallocation:

Information posted from IDC to NERC TLR website.

1. Restricted directions (all source/sink combinations that impact a Constrained Facility(ies) with TLR 2 or higher) will be posted to the NERC TLR website and updated as necessary.
2. TLR Constrained Facility status and Transfer Distribution Factors will continue to be posted to NERC TLR website.
3. Lowest priority of Interchange Transactions (marginal “bucket”) to be Reloaded/Reallocated next-hour on each TLR Constrained Facility will be posted on NERC TLR website. This will provide an indication to the market of priority of Interchange Transactions that may be Reloaded/Reallocated the following hours.

IDC Logic, IDC Report, and Timing

1. The Reliability Coordinator will run the IDC the Reloading/Reallocation report at approximately 00:26. The IDC will prompt the Reliability Coordinator to enter a maximum loading value. The IDC will alarm if the Reliability Coordinator does not enter this value and issue a report by 00:30 or change from TLR 3a Level. The Report will be distributed to Balancing Authorities and Transmission Operators at 00:30. This process repeats every hour as long as the approved tag submission deadline for Reallocation is in effect (or until the TLR level is reduced to 1 or 0).
2. For Interchange Transactions in the restricted directions, tags must be submitted to the IDC by the approved tag submission deadline for Reallocation to be considered for Reallocation next-hour. The time stamp by the Tag Authority is regarded the official tag submission time.
3. Tags submitted to IDC after the approved tag submission deadline for Reallocation will not be allowed to start or increase but will be considered for Reallocation the next hour.
4. Interchange Transactions in restricted directions that are not indicated as “PROCEED” on the Reload/Reallocation Report will not be permitted to start or increase next hour.

Reloading/Reallocation Transaction Status

Reloading/Reallocation status will be determined by the IDC for all Interchange Transactions. The Reloading/Reallocation status of each Interchange Transaction will be listed on IDC reports and NERC TLR website as appropriate. An Interchange Transaction is considered to be in a restricted direction if it is at or above the Curtailment Threshold. Interchange Transactions below the Curtailment Threshold are unrestricted and free to flow subject to all applicable Reliability Standards and tariff rules.

1. **HOLD.** Permission has not been given for Interchange Transaction to start or increase and is waiting for the next Reloading/Reallocation evaluation for which it is a candidate. Interchange Transactions with E-tags submitted to the Tag Authority prior to TLR 2 or higher being declared (pre-tagged) will change to CURTAILED Status upon evaluation that does not permit them to start or increase. Transactions with E-tags submitted to Tag Authority after TLR 2 or higher was declared (post-tagged) will retain HOLD Status until given permission to proceed or E-Tag expires.
2. **CURTAILED.** Transactions for which E-Tags were submitted to Tag Authority prior to TLR 2 or higher being declared (pre-tagged) and ordered to be curtailed totally, curtailed partially, not permitted to start, or not permitted to increase. Interchange Transactions (pre-tagged or post-tagged) that were flowing and ordered to be reduced or totally curtailed. The Balancing Authority will indicate to the IDC through the E-Tag adjustment table the Interchange Transaction's curtailed values.
3. **PROCEED:** Interchange Transaction is flowing or has been permitted to flow as a result of Reloading/Reallocation evaluation. The Balancing Authority will indicate through the E-Tag adjustment table to IDC if Interchange Transaction will reload, start, or increase next-hour per Purchasing-Selling Entity's energy schedule as appropriate.

Reallocation/Reloading Priorities

1. Interchange Transaction candidates are ranked for loading and curtailment by priority as per Section 4, "Principles for Mitigating Constraints On and Off the Contract Path." This is called the "Constrained Path Method," or CPM. (secondary, hourly, daily, ... firm etc). Interchange Transactions are curtailed and loaded pro-rata within priority level per TLR algorithm.
2. Reloading/Reallocation of Interchange Transactions are prioritized first by priority per CPM. E-Tags must be submitted to the IDC by the approved tag submission deadline for Reallocation of the hour during which the Interchange Transaction is scheduled to start or increase to be considered for Reallocation.
3. During Reloading/Reallocation, Interchange Transactions using lower priority Transmission Service will be curtailed pro-rata to allow higher priority transactions to reload, increase, or start. Equal priority Interchange Transactions will not reload, start, or increase by pro-rata Curtailment of other equal priority Interchange Transactions.
4. Reloading of Interchange Transactions using Non-firm Transmission Service with CURTAILED Status will take precedence over starting or increasing of Interchange

Transactions using Non-firm Transmission Service of the same priority with PENDING Statuses.

5. Interchange Transactions using Firm Point-to-Point Transmission Service will be allowed to start as scheduled under TLR 3a as long as their E-Tag was received by the IDC by the approved tag submission deadline for Reallocation of the hour during which the Interchange Transaction is due to start or increase, regardless of whether the E-tag was submitted to the Tag Authority prior to TLR 2 or higher being declared or not. If this is the initial issuance of the TLR 3a, Interchange Transactions using Firm Point-to-Point Transmission Service will be allowed to start as scheduled as long as their E-Tag was received by the IDC by the time the TLR is declared.

Total Flow Value on a Constrained Facility for Next Hour

1. The Reliability Coordinator will calculate the change in net flow on a Constrained Facility due to Reallocation for the next hour based on:
 - Present constrained facility loading, present level of Interchange Transactions, and Balancing Authorities NNative Load responsibility (TLR Level 5a) impacting the Constrained Facility,
 - SOLs or IROLs, known interchange impacts and Balancing Authority NNative Load responsibility (TLR Level 5a) on the Constrained Facility the next hour, and
 - Interchange Transactions scheduled to begin the next hour.
2. The Reliability Coordinator will enter a maximum loading value for the constrained facility into the IDC as part of issuing the Reloading/Reallocation report.
3. The Reliability Coordinator is allowed to call for TLR 3a or 5a when approaching a SOL or IROL to allow maximum transactional flow next hour, and to manage flows without violating transmission limits.
4. The simultaneous curtailment and Reallocation for a Constrained Facility is allowed. This reduces the flow over the Constrained Facility while allowing Interchange Transactions using higher priority Transmission Service to start or increase the next hour. This may be used to accommodate change in flow next-hour due to changes other than Point-to-Point Interchange Transactions while respecting the priorities of Interchange Transactions flowing and scheduled to flow the next hour. The intent is to reduce the need for using TLR 3b, which prevents new Interchange Transactions from starting or increasing the next hour.
5. The Reliability Coordinator must allow Interchange Transactions to be reloaded as soon as possible. Reloading must be in an orderly fashion to prevent a SOL or IROL violation from (re)occurring and requiring holding or curtailments in the restricted direction.

E2. Timing Requirements

TLR Levels 3a and 5a Issuing/Processing Time Requirement

1. In order for the IDC to be reasonably certain that a TLR Level 3a or 5a re-allocation/reloading report in which all tags submitted by the approved tag submission deadline for Reallocation are included, the report must be generated no earlier than 00:25 to allow the 10-minute approval time for Transactions that start next hour.
2. In order to allow a Reliability Coordinator to declare a TLR Level 3a or 5a at any time during the hour, the TLR declaration and Reallocation/Reloading report distribution will be treated as independent processes by the IDC. That is, a Reliability Coordinator may declare a TLR Level 3a or 5a at any time during the course of an hour. However, if a TLR Level 3a or 5a is declared for the next hour prior to 00:25 (see Figure 5 at right), the Reallocation/Reloading report that is generated will be made available to the issuing Reliability Coordinator only for previewing purposes, and cannot be distributed to the other Reliability Coordinators or the market. Instead, the issuing Reliability Coordinator will be reminded by an IDC alarm at 00:25 to generate a new Reallocation/Reloading report that will include all tags submitted prior to the approved tag submission deadline for Reallocation.
3. A TLR Level 3a or 5a Reallocation/Reloading report must be confirmed by the issuing Reliability Coordinator prior to 00:30 in order to provide a minimum of 30 minutes for the Reliability Coordinators with tags sinking in its Reliability Area to coordinate the Reallocation and Reloading with the Sink Balancing Authorities. This provides only 5 minutes (from 00:25 to 00:30) for the issuing Reliability Coordinator to generate a Reallocation/Reloading report, review it, and approve it.
4. The TLR declaration time will be recorded in the IDC for evaluating transaction sub-priorities for Reallocation/Reloading purposes (see Subpriority Table, in the **IDC Calculations and Reporting** section below).

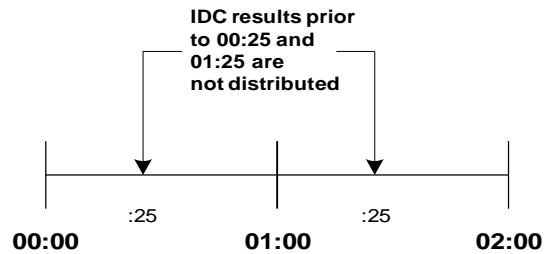


Figure 5 - IDC report may be run prior to 00:25, but results are not distributed.

Re-Issuing of a TLR Level 2 or Higher

Each hour, the IDC will automatically remind the issuing Reliability Coordinator (via an IDC alarm) of a TLR level 2 or higher declared in the previous hour or earlier about re-issuing the TLR. The purpose of the reminder is to enable the Reliability Coordinator to Reallocate or reload currently halted or curtailed Interchange Transactions next hour. The reminder will be in the form of an alarm to the issuing Reliability Coordinator, and will take place at 00:25 so that, if the Reliability Coordinator re-issues the TLR as a TLR level 3a or 5a, all tags submitted prior to the approved tag submission deadline for Reallocation are available in the IDC.

IDC Assistance with Next Hour Point-to-Point Transactions

In order to assist a Reliability Coordinator in determining the MW relief required on a Constrained Facility for the next hour for a TLR level 3a or 5a, the IDC will calculate and present the total MW impact of all currently flowing and scheduled Point-to-Point Transactions

for the next hour. In order to assist a Reliability Coordinator in determining the MW relief required on a Constrained Facility for the next hour during a TLR level 5a, the IDC will calculate and present the total MW impact of all currently flowing and scheduled Point-to-Point Transactions for the next hour as well as Balancing Authority with flows due to service to Network Customers and Native Load. The Reliability Coordinator will then be requested to provide the total incremental or decremental MW amount of flow through the Constrained Facility that can be allowed for the next hour. The value entered by the Reliability Coordinator and the IDC-calculated amounts will be used by the IDC to identify the relief/reloading amounts (delta incremental flow value) on the constrained facility. The IDC will determine the Transactions to be reloaded, reallocated, or curtailed to make room for the Transactions using higher priority Transmission Service. The following examples show the calculation performed by IDC to identify the “delta incremental flow:”

Example 1

Flow to maintain on Facility	800 MW
Expected flow next hour from Transactions using Point-to-Point Transmission Service	950 MW
Contribution from flow next hour from service to Network customers and Native Load	-100 MW
Expected Net flow next hour on Facility	850 MW
Amount of Transactions using Point-to-Point Transmission Service to hold for Reallocation	850 MW – 800 MW = 50 MW
Amount to enter into IDC for Transactions using Point-to-Point Transmission Service	950 MW – 50 MW = 900 MW

Example 2

Flow to maintain on Facility	800 MW
Expected flow next hour from Transactions using Point-to-Point Transmission Service	950 MW
Contribution from flow next hour from service to Network customers and Native Load	50 MW
Expected Net flow next hour on Facility	1000 MW
Amount of Transactions using Point-to-Point Transmission Service to hold for Reallocation	1000 MW – 800 MW = 200 MW
Amount to enter into IDC for Transactions using Point-to-Point Transmission Service	950 MW – 200 MW = 750 MW

Example 3

Flow to maintain on Facility	800 MW
Expected flow next hour from Transactions using Point-	950 MW

to-Point Transmission Service	
Contribution from flow next hour from service to Network customers and Native Load	-200 MW
Expected Net flow next hour on Facility	750 MW
Amount of Transactions using Point-to-Point Transmission Service to hold for Reallocation	750 MW – 800 MW = -50 MW None are held

For a TLR levels 3b or 5b the IDC will request the Reliability Coordinator to provide the MW requested relief amount on the Constrained Facility, and will not present the current and next hour MW impact of Point-to-Point transactions. The Reliability Coordinator-entered requested relief amount will be used by the IDC to determine the Interchange Transaction Curtailments and flows due to service to Network Customers and Native Load (TLR Level 5b) in order to reduce the SOL or IROL violation on the Constrained Facility by the requested amount.

IDC Calculations and Reporting

At the time the TLR report is processed, the IDC will use all candidate Interchange Transactions for Reallocation that met the approved tag submission deadline for Reallocation plus those Interchange Transactions that were curtailed or halted on the previous TLR action of the same TLR event. The IDC will calculate and present an Interchange Transactions Halt/Curtailment list that will include reload and Reallocation of Interchange Transactions. The Interchange Transactions are prioritized as follows:

1. All Interchange Transactions will be arranged by Transmission Service Priority according to the Constrained Path Method. These priorities range from 1 to 6 for the various non-firm Transmission Service products (TLR levels 3a and 3b). Interchange Transactions using Firm Transmission Service (priority 7) are used only in TLR levels 5a and 5b. Next-Hour Market Service is included at priority 0 (Recommended to be placed in Attachment 2).

Examples of Interchange Transactions using Non-firm Transmission Service sub-priority settings begin in the **Transaction Sub-priority Examples** following sections

2. All Interchange Transactions using Firm Transmission Service will be put in the same priority group, and will be Curtailed/Reallocated pro-rata, independent of their current status (curtailed or halted) or time of submittal with respect to TLR issuance (TLR level 5a). Under a TLR 5a, all Interchange Transactions using Non-firm Transmission Service that is at or above the Curtailment Threshold will have been curtailed and hence sub-prioritizing is not required.

All Interchange Transactions processed in a TLR are assigned one of the following statuses:

- PROCEED:** The Interchange Transaction has started or is allowed to start to the next hour MW schedule amount.
- CURTAILED:** The Interchange Transaction has started and is curtailed due to the TLR, or it had not started but it was submitted prior to the TLR being declared (level 2 or higher).

HOLD: The Interchange Transaction had never started and it was submitted after the TLR being declared – the Interchange Transaction is held from starting next hour or the transaction had never started and it was submitted to the IDC after the Approved-Tag Submission Deadline – the Interchange Transaction is to be held from starting next hour and is not included in the Reallocation calculations until following hour.

Upon acceptance of the TLR Transaction Reallocation/reloading report by the issuing Reliability Coordinator, the IDC will generate a report to be sent to NERC that will include the PSE name and Tag ID of each Interchange Transaction in the IDC TLR report. The Interchange Transaction will be ranked according to its assigned status of HOLD, CURTAILED or PROCEED. The reloading/Reallocation report will be made available at NERC's public TLR website, and it is NERC's responsibility to format and publish the report.

Tag Reloading for TLR Levels 1 and 0

When a TLR Level 1 or 0 is issued, the Constrained Facility is no longer under SOL or IROL violation and all Interchange Transactions are allowed to flow. In order to provide the Reliability Coordinators with a view of the Interchange Transactions that were halted or curtailed on previous TLR actions (level 2 or higher) and are now available for reloading, the IDC provides such information in the TLR report.

New Tag Alarming

Those Interchange Transactions that are at or above the Curtailment Threshold and are *not* candidates for Reallocation because the tags for those Transactions were not submitted by the approved tag submission deadline for Reallocation will be flagged as HOLD and must not be permitted to start or increase during the next hour. To alert Reliability Coordinators of those Transactions required to be held, the IDC will generate a report (for viewing within the IDC only) at various times. The report will include a list of all HOLD Transactions. In order not to overwhelm the Reliability Coordinator with alarms, only those who issued the TLR and those whose Transactions sink within their Reliability Area will be alarmed. An alarm will be issued for a given tag only once and will be issued for all TLR levels for which halting new Transactions is required: TLR Level 2, 3a, 3b, 5a and 5b.

Tag Adjustment

The Interchange Transactions with statuses of HOLD, CURTAILED or PROCEED must be adjusted by a Tag Authority or Tag Approval entity. Without the tag adjustments, the IDC will assume that Interchange Transactions were not curtailed/held and are flowing at their specified schedule amounts.

1. Interchange Transactions marked as CURTAILED should be adjusted to a cap equal to, or at the request of the originating PSE, less than the reallocated amount (shown as the MW CAP on the IDC report). This amount may be zero if the Transaction is fully curtailed.
2. Interchange Transaction marked as PROCEED should be adjusted to reload (NULL or to its MW level in accordance with its Energy Profile in the adjusted MW in the E-Tag) if the Interchange Transaction has been previously adjusted; otherwise, if the Interchange Transaction is flowing in full, the Tag Authority need not issue an adjust.
3. Interchange Transactions marked as HOLD should be adjusted to 0 MW.

Special Tag Status

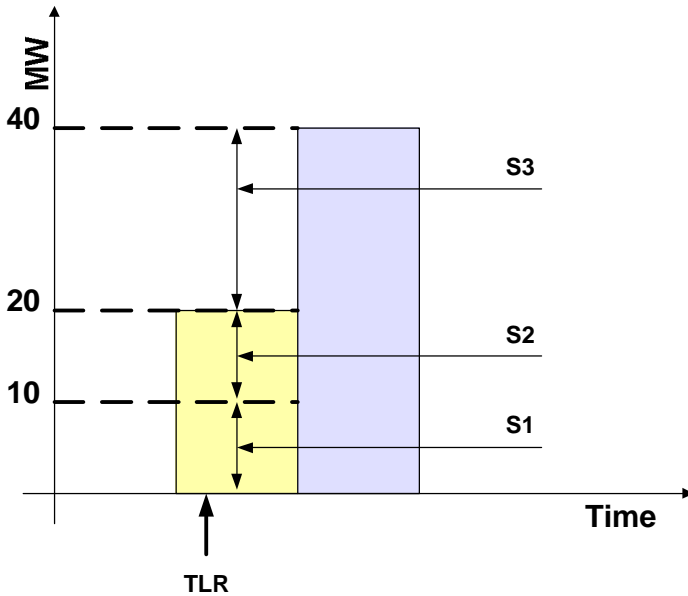
There are cases in which a tag may be marked with a composite state of ATTN_REQD to indicate that tag Authority/Approval failed to communicate or there is an inconsistency between the validation software of different tag Authority/Approval entities. In this situation, the tag is no longer subject to passive approval and its status change to IMPLEMENT may take longer than 10 minutes. Under these circumstances, the IDC may have a tag that is issued prior to the Tag Submittal Deadline that will not be a candidate for Reallocation. Such tags, when approved by the Tag Authority, will be marked as HOLD and must be halted.

Transaction Sub-Priority Examples

The following describes examples of Interchange Transactions using Non-firm Transmission Service sub-priority setting for an Interchange Transaction under different circumstances of current-hour and next-hour schedules and active MW flowing as modified by tag adjust table in E-Tag.

Example 1 – Transaction curtailed, next-hour Energy Profile is higher

Energy Profile: Current hour	20 MW
Actual flow following curtailment: Current hour	10 MW
Energy Profile: Next hour	40 MW

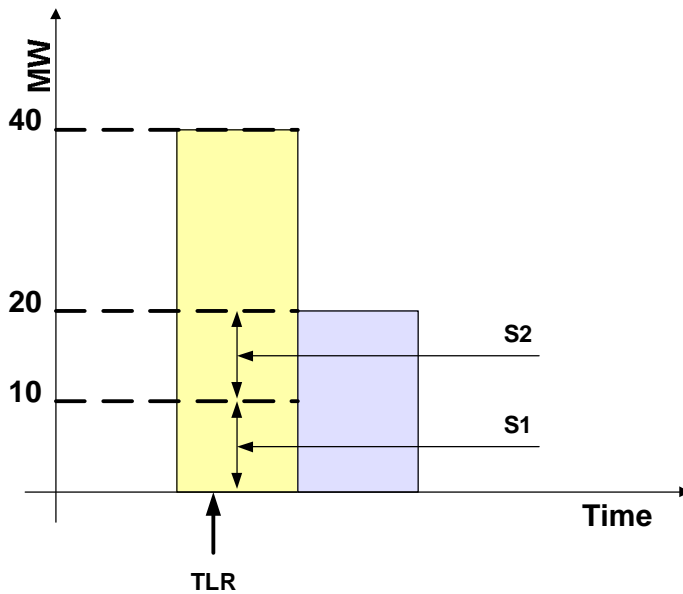


Sub-priorities for Transaction MW:

<i>Sub-Priority</i>	<i>MW Value</i>	<i>Explanation</i>
S1	10 MW	Maintain current curtailed flow
S2	+10 MW	Reload to current hour Energy Profile
S3	+20 MW	Load to next hour Energy Profile
S4		

Example 2 – Transaction curtailed, next-hour Energy Profile is lower

Energy Profile: Current hour	40 MW
Actual flow following curtailment: Current hour	10 MW
Energy Profile: Next hour	20 MW

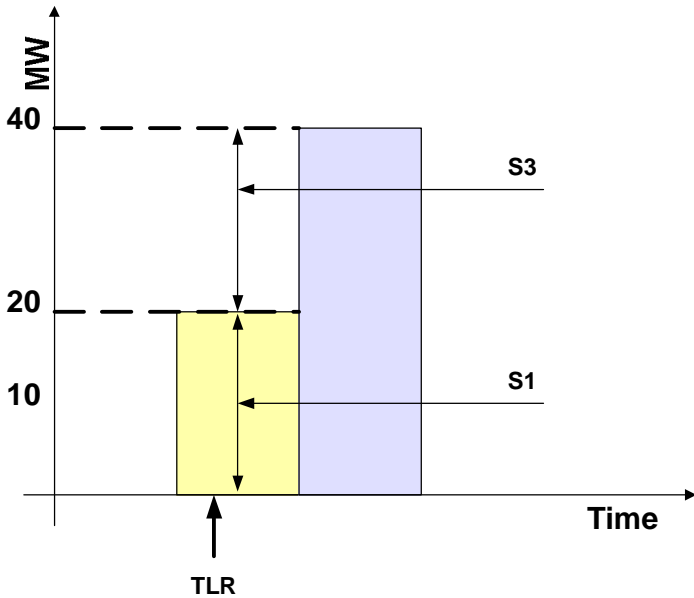


Sub-priorities for Transaction MW:

<i>Sub-Priority</i>	<i>MW Value</i>	<i>Explanation</i>
S1	10 MW	Maintain current curtailed flow
S2	+10 MW	Reload to <i>lesser</i> of current and next-hour Energy Profile
S3	+0 MW	Next-hour Energy Profile is 20MW, so no change in MW value
S4		

Example 3 – Transaction not curtailed, next-hour Energy Profile is higher

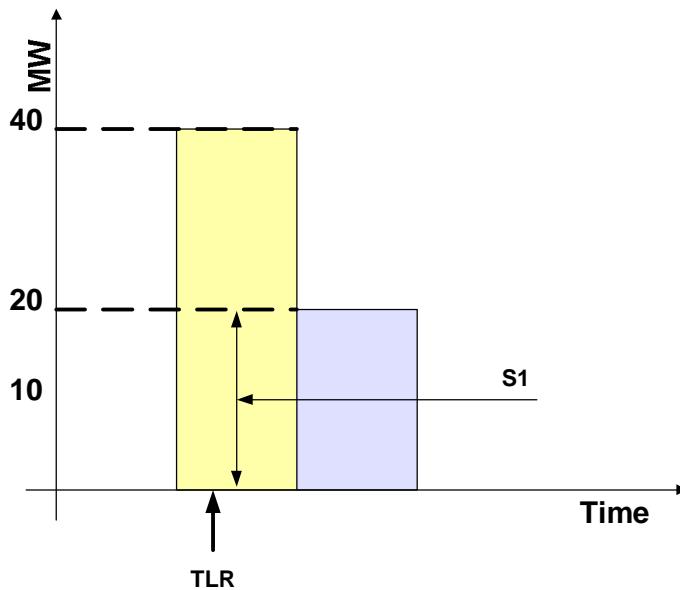
Energy Profile: Current hour	20 MW
Actual flow following curtailment: Current hour	20 MW (no curtailment)
Energy Profile: Next hour	40 MW



<i>Sub-Priority</i>	<i>MW Value</i>	<i>Explanation</i>
S1	20 MW	Maintain current flow (not curtailed)
S2	+0 MW	Reload to <i>lesser</i> of current and next-hour Energy Profile
S3	+20 MW	Next-hour Energy Profile is 40MW
S4		

Example 4 – Transaction not curtailed, next-hour Energy Profile is lower

Energy Profile: Current hour	40 MW
Actual flow following curtailment: Current hour	40 MW (no curtailment)
Energy Profile: Next hour	20 MW

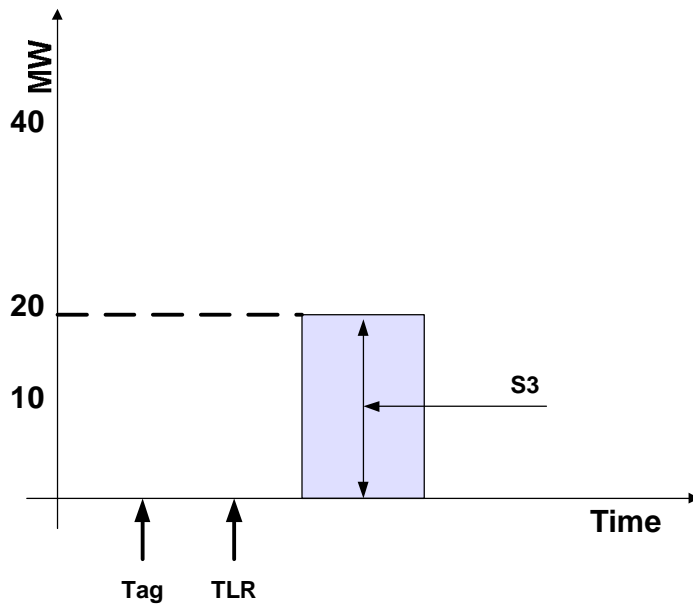


Sub-priorities for Transaction MW:

<i>Sub-Priority</i>	<i>MW Value</i>	<i>Explanation</i>
S1	20 MW	Reduce flow to next-hour Energy Profile (20MW)
S2	+0 MW	Reload to <i>lesser</i> of current and next-hour Energy Profile
S3	+0 MW	Next-hour Energy Profile is 20MW
S4		

Example 5 — TLR Issued before Transaction was scheduled to start

Energy Profile: Current hour	0 MW
Actual flow following curtailment: Current hour	0 MW (Transaction scheduled to start <i>after</i> TLR initiated)
Energy Profile: Next hour	20 MW



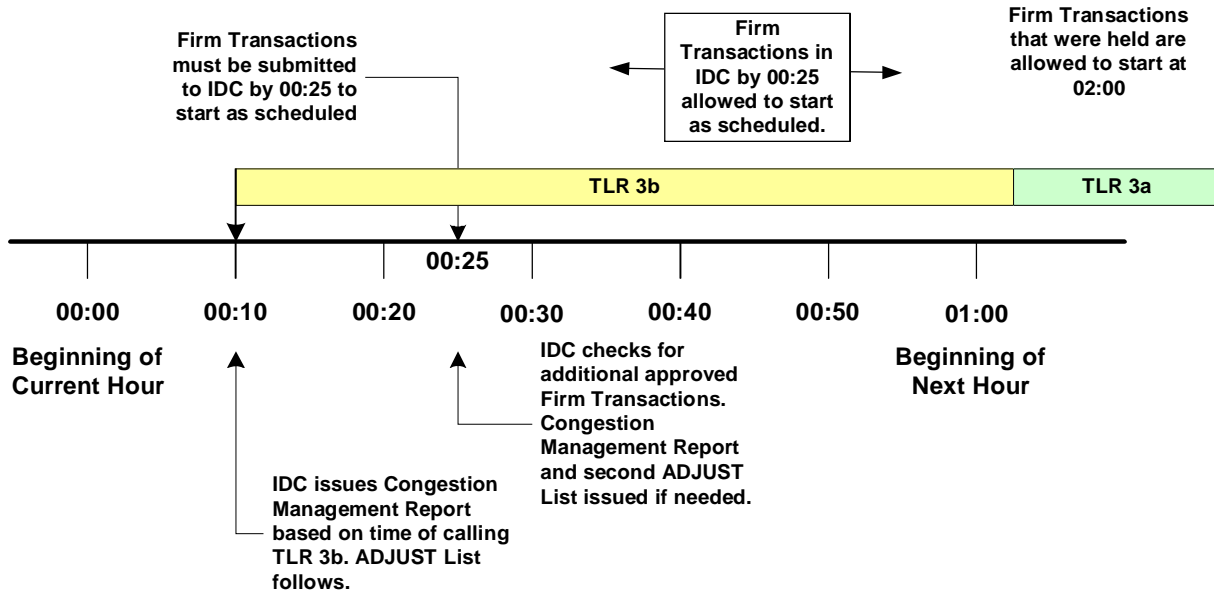
<i>Sub-Priority</i>	<i>MW Value</i>	<i>Explanation</i>
S1	0 MW	Transaction was not allowed to start
S2	+0 MW	Transaction was not allowed to start
S3	+20 MW	Next-hour Energy Profile is 20MW
S4	+0	Tag submitted prior to TLR

Appendix F. Considerations for Interchange Transactions

Using Firm Point-to-Point Transmission Service

The following cases explain the circumstances under which an Interchange Transaction using Firm Point-to-Point Transmission Service will be allowed to start as scheduled during a TLR 3b:

Case 1: TLR 3b is called between 00:00 and 00:25 and the Interchange Transaction using Firm Point-to-Point Transmission Service is submitted to IDC by 00:25.



The IDC will examine the current hour (00) and next hour (01) for all Interchange Transactions.

The IDC will issue an ADJUST List based upon the time the TLR 3b is called. The ADJUST List will include curtailments of Interchange Transactions using Non-firm Point-to-Point Transmission Service as necessary to allow room for those Interchange Transactions using Firm Point-to-Point Transmission Service to start as scheduled.

At 00:25, the IDC will check for additional Interchange Transactions using Firm Point-to-Point Transmission Service that were submitted to the IDC by that time and issue a second ADJUST List if those additional Interchange Transactions are found.

All existing or new Interchange Transactions using Non-firm Point-to-Point Transmission Service that are increasing or expected to start during the current hour or next hour will be placed on HALT or HOLD. There is no Reallocation of lower-priority Interchange Transactions using Non-firm Point-to-Point Transmission Service.

Interchange Transactions using Firm Point-to-Point Transmission Service that were submitted to the IDC by 00:25 will be allowed to start as scheduled.

Standard IRO-006-4.1 — Reliability Coordination — Transmission Loading Relief

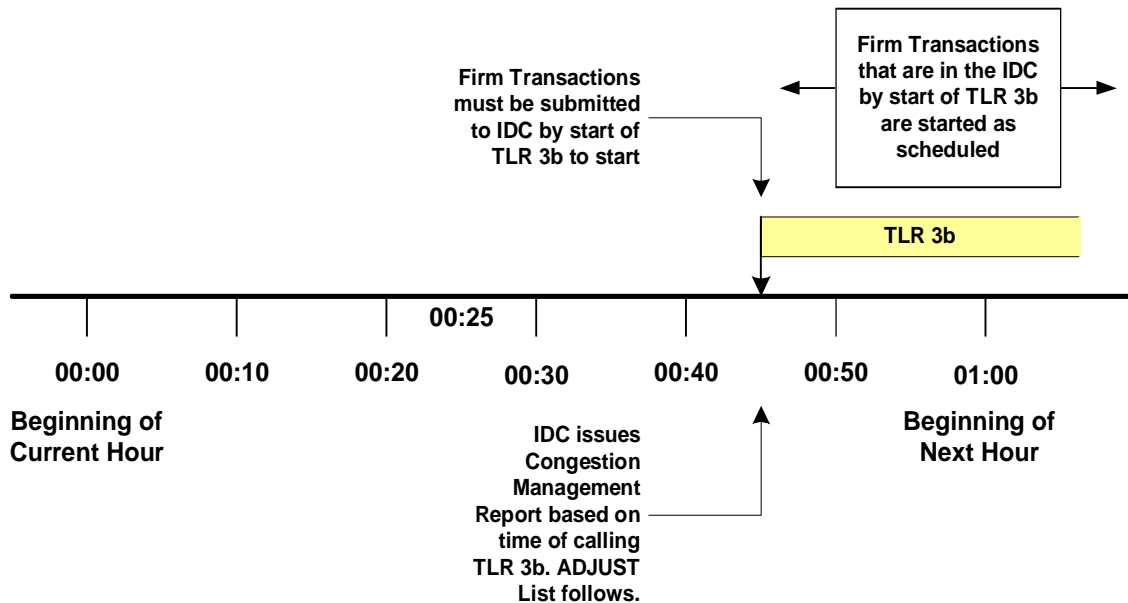
Interchange Transactions using Firm Point-to-Point Transmission Service that were submitted to the IDC after 00:25 will be held.

Once the SOL or IROL violation is mitigated, the Reliability Coordinator shall call a TLR Level 3a (or lower). If a TLR Level 3a is called:

Interchange Transactions using Firm Point-to-Point Transmission Service that were submitted to the IDC by 00:25 will be allowed to start as scheduled at 02:00.

Interchange Transactions using Non-firm Point-to-Point Transmission Service that were held may then be reallocated to start at 02:00.

Case 2: TLR 3b is called after 00:25 and the Interchange Transaction using Firm Point-to-Point Transmission Service is submitted to the IDC no later than the time at which the TLR 3b is called.



The IDC will examine the current hour (00) and next hour (01) for all Interchange Transactions.

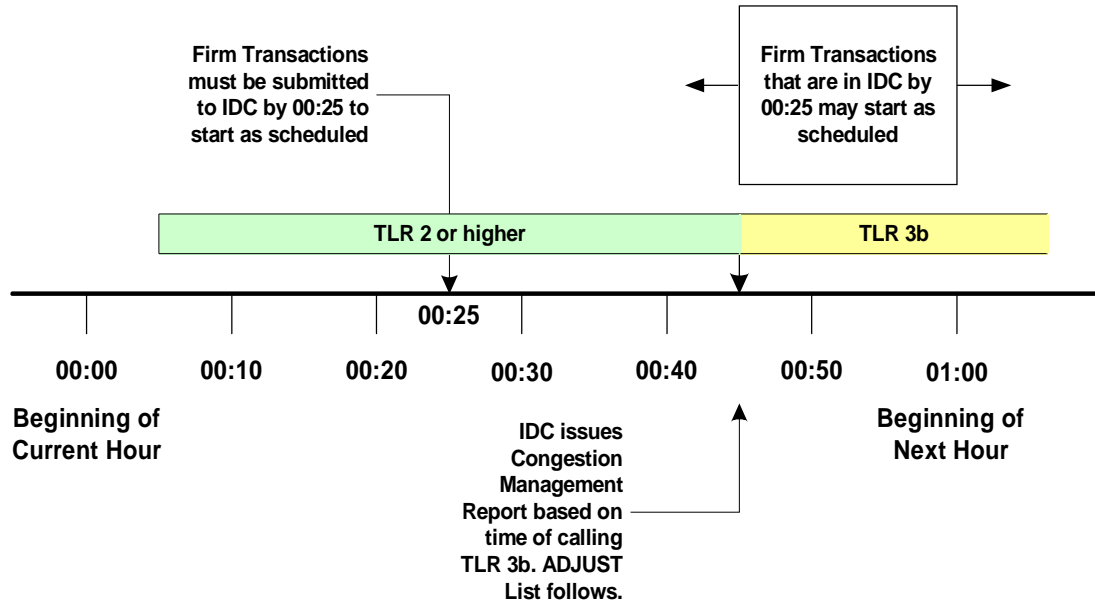
The IDC will issue an ADJUST List at the time the TLR 3b is called. The ADJUST List will include additional curtailments of Interchange Transactions using Non-firm Point-to-Point Transmission Service as necessary to allow room for those Interchange Transactions using Firm Point-to-Point Transmission Service to start at as scheduled.

All existing or new Interchange Transactions using Non-firm Point-to-Point Transmission Service that are increasing or expected to start during the current hour or next hour will be placed on HALT or HOLD. There is no Reallocation of lower-priority Interchange Transactions using Non-firm Point-to-Point Transmission Service.

Interchange Transactions using Firm Point-to-Point Transmission Service that were submitted to the IDC by the time the TLR 3b was called will be allowed to start at as scheduled.

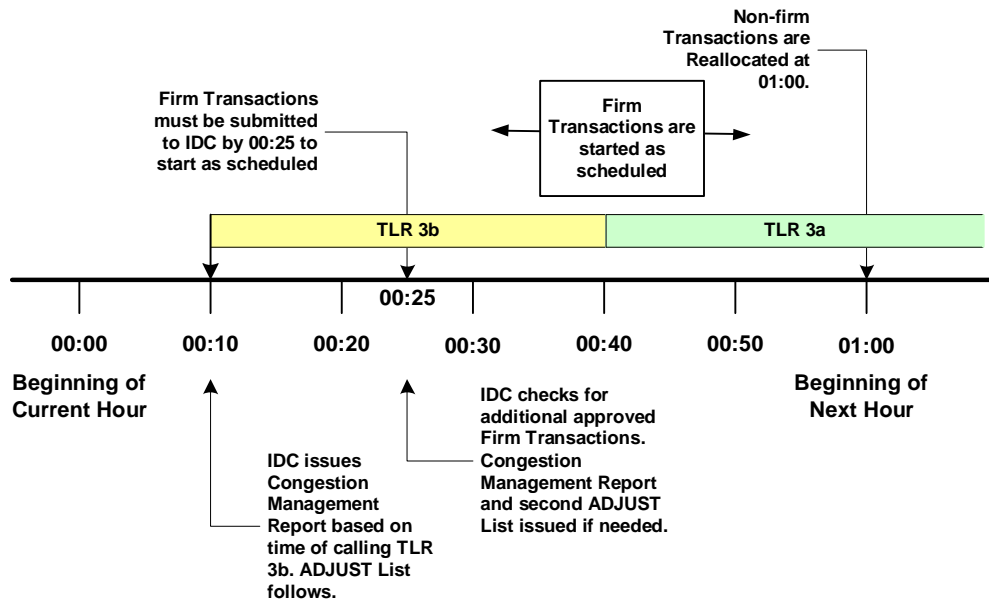
Interchange Transaction using Firm Point-to-Point Transmission Service that were submitted to the IDC after the TLR 3b was called will be held until the next issuance for TLR (either TLR 3b, 3a, or lower level).

Case 3. TLR 2 or higher is in effect, a TLR 3b is called after 00:25, and the Interchange Transaction using Firm Point-to-Point Transmission Service is submitted to the IDC by 00:25.



If a TLR 2 or higher has been issued and 3B is subsequently issued, then only those Interchange Transactions using Firm Point-to-Point Transmission Service that had been submitted to the IDC by 00:25 will be allowed to start as scheduled. All other Interchange Transactions are held.

Case 4. TLR 3b is called before 00:25 and the Interchange Transaction is submitted to the IDC by 00:25. TLR 3a is called at 00:40.

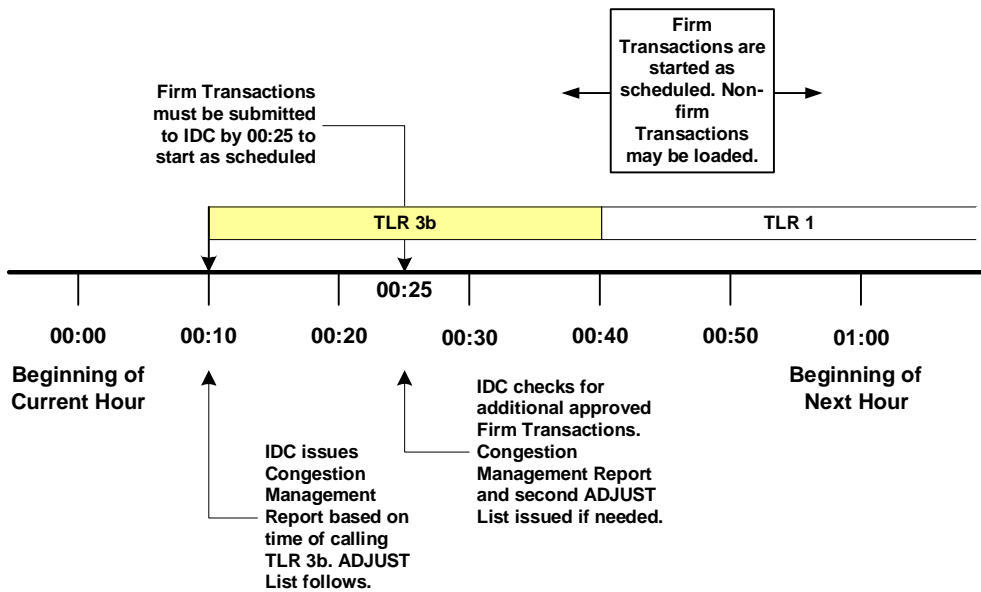


Same as Case 1, but TLR Level 3b ends at 00:40 and becomes TLR Level 3a.

All Interchange Transactions using Firm Point-to-Point Transmission Service will start as scheduled if in by the time the 3A is declared.

All Interchange Transactions using Non-firm Point-to-Point Transmission Service are reallocated at 01:00.

Case 5. TLR 3b is called before 00:25 and the Interchange Transaction is submitted to the IDC by 00:25. TLR 1 is called at 00:40.



Same as Case 1, but TLR Level 3b ends at 00:40 and becomes TLR Level 1.

All Interchange Transactions using Firm Point-to-Point Transmission Service will start as scheduled.

All Interchange Transactions using Non-firm Point-to-Point Transmission Service may be loaded immediately.

A. Introduction

1. **Title:** **Documentation of the Accounting Methodology for the Effects of Controllable Demand-Side Management in Demand and Energy Forecasts.**
2. **Number:** MOD-021-0.1
3. **Purpose:** To ensure that assessments and validation of past events and databases can be performed, reporting of actual Demand data is needed. Forecast demand data is needed to perform future system assessments to identify the need for system reinforcement for continued reliability. In addition, to assist in proper real-time operating, load information related to controllable Demand-Side Management (DSM) programs is needed.
4. **Applicability:**
 - 4.1. Load-Serving Entity
 - 4.2. Transmission Planner
 - 4.3. Resource Planner
5. **Effective Date:** April 1, 2005

B. Requirements

- R1.** The Load-Serving Entity, Transmission Planner and Resource Planner’s forecasts shall each clearly document how the Demand and energy effects of DSM programs (such as conservation, time-of-use rates, interruptible Demands, and Direct Control Load Management) are addressed.
- R2.** The Load-Serving Entity, Transmission Planner and Resource Planner shall each include information detailing how Demand-Side Management measures are addressed in the forecasts of its Peak Demand and annual Net Energy for Load in the data reporting procedures of Standard MOD-016-0_R1.
- R3.** The Load-Serving Entity, Transmission Planner and Resource Planner shall each make documentation on the treatment of its DSM programs available to NERC on request (within 30 calendar days).

C. Measures

- M1.** The Load-Serving Entity, Transmission Planner and Resource Planner forecasts clearly document how the demand and energy effects of DSM programs (such as conservation, time-of-use rates, interruptible demands, and Direct Control Load Management) are addressed.
- M2.** The Load-Serving Entity, Transmission Planner and Resource Planner information detailing how Demand-Side Management measures are addressed in the forecasts of Peak Demand and annual Net Energy for Load are included in the data reporting procedures of Reliability Standard MOD-016-0_R1.
- M3.** The Load-Serving Entity, Planning Authority and Resource Planner shall each provide evidence to its Compliance Monitor that it provided documentation on the treatment of DSM programs to NERC as requested (within 30 calendar days).

D. Compliance

1. **Compliance Monitoring Process**
 - 1.1. **Compliance Monitoring Responsibility**

Compliance Monitor: Regional Reliability Organization.
 - 1.2. **Compliance Monitoring Period and Reset Timeframe**

Standard MOD-021-0.1 — Accounting Methodology for Effects of Controllable DSM in Forecasts

On request (within 30 calendar days).

1.3. Data Retention

None specified.

1.4. Additional Compliance Information

None.

2. Levels of Non-Compliance

2.1. Level 1: Documentation on the treatment of DSM programs in the demand and energy forecasts was provided, but was incomplete.

2.2. Level 2: Not applicable.

2.3. Level 3: Not applicable.

2.4. Level 4: Documentation on the treatment of DSM programs in the demand and energy forecasts was not provided.

E. Regional Differences

1. None identified.

Version History

Version	Date	Action	Change Tracking
0	April 1, 2005	Effective Date	New
0.1	April 15, 2009	R1. – comma inserted after Load-Serving Entity	Errata

A. Introduction

1. **Title:** Documentation of the Accounting Methodology for the Effects of Controllable Demand-Side Management in Demand and Energy Forecasts.
2. **Number:** MOD-021-0.1
3. **Purpose:** To ensure that assessments and validation of past events and databases can be performed, reporting of actual Demand data is needed. Forecast demand data is needed to perform future system assessments to identify the need for system reinforcement for continued reliability. In addition, to assist in proper real-time operating, load information related to controllable Demand-Side Management (DSM) programs is needed.
4. **Applicability:**
 - 4.1. Load-Serving Entity
 - 4.2. Transmission Planner
 - 4.3. Resource Planner
5. **Effective Date:** April 1, 2005

B. Requirements

- R1. The Load-Serving Entity, Transmission Planner and Resource Planner's forecasts shall each clearly document how the Demand and energy effects of DSM programs (such as conservation, time-of-use rates, interruptible Demands, and Direct Control Load Management) are addressed.
- R2. The Load-Serving Entity, Transmission Planner and Resource Planner shall each include information detailing how Demand-Side Management measures are addressed in the forecasts of its Peak Demand and annual Net Energy for Load in the data reporting procedures of Standard MOD-016-0_R1.
- R3. The Load-Serving Entity, Transmission Planner and Resource Planner shall each make documentation on the treatment of its DSM programs available to NERC on request (within 30 calendar days).

C. Measures

- M1. The Load-Serving Entity, Transmission Planner and Resource Planner forecasts clearly document how the demand and energy effects of DSM programs (such as conservation, time-of-use rates, interruptible demands, and Direct Control Load Management) are addressed.
- M2. The Load-Serving Entity, Transmission Planner and Resource Planner information detailing how Demand-Side Management measures are addressed in the forecasts of Peak Demand and annual Net Energy for Load are included in the data reporting procedures of Reliability Standard MOD-016-0_R1.
- M3. The Load-Serving Entity, Planning Authority and Resource Planner shall each provide evidence to its Compliance Monitor that it provided documentation on the treatment of DSM programs to NERC as requested (within 30 calendar days).

D. Compliance

1. **Compliance Monitoring Process**
 - 1.1. **Compliance Monitoring Responsibility**

Compliance Monitor: Regional Reliability Organization.

1.2. Compliance Monitoring Period and Reset Timeframe

On request (within 30 calendar days).

1.3. Data Retention

None specified.

1.4. Additional Compliance Information

None.

2. Levels of Non-Compliance

2.1. Level 1: Documentation on the treatment of DSM programs in the demand and energy forecasts was provided, but was incomplete.

2.2. Level 2: Not applicable.

2.3. Level 3: Not applicable.

2.4. Level 4: Documentation on the treatment of DSM programs in the demand and energy forecasts was not provided.

E. Regional Differences

1. None identified.

Version History

Version	Date	Action	Change Tracking
0	April 1, 2005	Effective Date	New
0.1	April 15, 2009	R1. – comma inserted after Load-Serving Entity	Errata

Standard PER-001-0.1 — Operating Personnel Responsibility and Authority

A. Introduction

1. **Title:** **Operating Personnel Responsibility and Authority**
2. **Number:** PER-001-0.1
3. **Purpose:** Transmission Operator and Balancing Authority operating personnel must have the responsibility and authority to implement real-time actions to ensure the stable and reliable operation of the Bulk Electric System.
4. **Applicability**
 - 4.1. Transmission Operators.
 - 4.2. Balancing Authorities.
5. **Effective Date:** April 1, 2005

B. Requirements

- R1. Each Transmission Operator and Balancing Authority shall provide operating personnel with the responsibility and authority to implement real-time actions to ensure the stable and reliable operation of the Bulk Electric System.

C. Measures

- M1. The Transmission Operator and Balancing Authority provide documentation that operating personnel have the responsibility and authority to implement real-time actions to ensure the stable and reliable operation of the Bulk Electric System. These responsibilities and authorities are understood by the operating personnel. Documentation shall include:
 - M1.1 A written current job description that states in clear and unambiguous language the responsibilities and authorities of each operating position of a Transmission Operator and Balancing Authority. The job description identifies personnel subject to the authority of the Transmission Operator and Balancing Authority.
 - M1.2 The current job description is readily accessible in the control room environment to all operating personnel.
 - M1.3 A written current job description that states operating personnel are responsible for complying with the NERC reliability standards.
 - M1.4 Written operating procedures that state that, during normal and emergency conditions, operating personnel have the authority to take or direct timely and appropriate real-time actions. Such actions shall include shedding of firm load to prevent or alleviate System Operating Limit Interconnection or Reliability Operating Limit violations. These actions are performed without obtaining approval from higher-level personnel within the Transmission Operator or Balancing Authority.

D. Compliance

1. Compliance Monitoring Process

Periodic Review: An on-site review including interviews with Transmission Operator and Balancing Authority operating personnel and document verification will be conducted every three years. The job description identifying operating personnel authorities and responsibilities will be reviewed, as will the written operating procedures or other documents delineating the authority of the operating personnel to take actions necessary to maintain the reliability of the Bulk Electric System during normal and emergency conditions.

Standard PER-001-0.1 — Operating Personnel Responsibility and Authority

1.1. Compliance Monitoring Responsibility

Self-certification: The Transmission Operator and Balancing Authority shall annually complete a self-certification form developed by the Regional Reliability Organization based on measures M1.1 to M1.4.

1.2. Compliance Monitoring Period and Reset Timeframe

One calendar year.

1.3. Data Retention

Permanent.

1.4. Additional Compliance Information

2. Levels of Non-Compliance

2.1. Level 1: The Transmission Operator or Balancing Authority has written documentation that includes three of the four items in M1.

2.2. Level 2: The Transmission Operator or Balancing Authority has written documentation that includes two of the four items in M1.

2.3. Level 3: The Transmission Operator or Balancing Authority has written documentation that includes one of the four items in M1.

2.4. Level 4: The Transmission Operator or Balancing Authority has written documentation that includes none of the items in M1, or the personnel interviews indicate Transmission Operator or Balancing Authority do not have the required authority.

E. Regional Differences

None identified.

Version History

Version	Date	Action	Change Tracking
0	April 1, 2005	Effective Date	New
0	August 8, 2005	Removed "Proposed" from Effective Date	Errata
0.1	April 15, 2009	Replaced "position" with "job" on M1.1 Errata	Errata

A. Introduction

1. **Title:** **Operating Personnel Responsibility and Authority**
2. **Number:** PER-001-0.1
3. **Purpose:** Transmission Operator and Balancing Authority operating personnel must have the responsibility and authority to implement real-time actions to ensure the stable and reliable operation of the Bulk Electric System.
4. **Applicability**
 - 4.1. Transmission Operators.
 - 4.2. Balancing Authorities.
5. **Effective Date:** April 1, 2005

B. Requirements

- R1. Each Transmission Operator and Balancing Authority shall provide operating personnel with the responsibility and authority to implement real-time actions to ensure the stable and reliable operation of the Bulk Electric System.

C. Measures

- M1. The Transmission Operator and Balancing Authority provide documentation that operating personnel have the responsibility and authority to implement real-time actions to ensure the stable and reliable operation of the Bulk Electric System. These responsibilities and authorities are understood by the operating personnel. Documentation shall include:
 - M1.1 A written current job description that states in clear and unambiguous language the responsibilities and authorities of each operating position of a Transmission Operator and Balancing Authority. The ~~position-job~~ description identifies personnel subject to the authority of the Transmission Operator and Balancing Authority.
 - M1.2 The current job description is readily accessible in the control room environment to all operating personnel.
 - M1.3 A written current job description that states operating personnel are responsible for complying with the NERC reliability standards.
 - M1.4 Written operating procedures that state that, during normal and emergency conditions, operating personnel have the authority to take or direct timely and appropriate real-time actions. Such actions shall include shedding of firm load to prevent or alleviate System Operating Limit Interconnection or Reliability Operating Limit violations. These actions are performed without obtaining approval from higher-level personnel within the Transmission Operator or Balancing Authority.

D. Compliance

1. Compliance Monitoring Process

Periodic Review: An on-site review including interviews with Transmission Operator and Balancing Authority operating personnel and document verification will be conducted every three years. The job description identifying operating personnel authorities and responsibilities will be reviewed, as will the written operating procedures or other documents delineating the authority of the operating personnel to take actions necessary to maintain the reliability of the Bulk Electric System during normal and emergency conditions.

Standard PER-001-0.1 — Operating Personnel Responsibility and Authority

1.1. Compliance Monitoring Responsibility

Self-certification: The Transmission Operator and Balancing Authority shall annually complete a self-certification form developed by the Regional Reliability Organization based on measures M1.1 to M1.4.

1.2. Compliance Monitoring Period and Reset Timeframe

One calendar year.

1.3. Data Retention

Permanent.

1.4. Additional Compliance Information

2. Levels of Non-Compliance

- 2.1. Level 1:** The Transmission Operator or Balancing Authority has written documentation that includes three of the four items in M1.
- 2.2. Level 2:** The Transmission Operator or Balancing Authority has written documentation that includes two of the four items in M1.
- 2.3. Level 3:** The Transmission Operator or Balancing Authority has written documentation that includes one of the four items in M1.
- 2.4. Level 4:** The Transmission Operator or Balancing Authority has written documentation that includes none of the items in M1, or the personnel interviews indicate Transmission Operator or Balancing Authority do not have the required authority.

E. Regional Differences

None identified.

Version History

Version	Date	Action	Change Tracking
0	April 1, 2005	Effective Date	New
0	August 8, 2005	Removed "Proposed" from Effective Date	Errata
0.1	April 15, 2009	Replaced "position" with "job" on M1.1	Errata

Exhibit B

NERC Standards Committee Errata Procedure



Standards Committee Procedure

- Title:** Approving Errata in an Approved Reliability Standard
- Purpose:** To provide an approval process for incorporating errata changes in approved reliability standards
- Conditions:** When someone notifies the Standards Administrator that there is an error in an approved standard and the standards staff identifies the error as “errata”
- Errata:** For the purpose of this procedure, errata are errors in approved standards that, if corrected, do not change the scope or intent of the associated approved standard and do not have a material impact on the end users of the standard. Errata can include such things as:
- A misspelled word
 - An incorrect reference to a requirement or measure
 - An error, such as a missing word etc. that, when added or corrected, does not change the scope or technical content of the standard

Responsibility	Activity
Standards Administrator	Forward each notice of an error in an approved standard to the Standards Process Manager.
Standards Process Manager	<p>If the error falls into the errata category, produce a clean and red line version of the standard that shows the proposed correction(s).</p> <p>If the error is associated with an active project notify the drafting team of the error so that the error is not duplicated.</p> <p>If the error does not meet the errata criteria, and there are no active standards projects involving the applicable standard, add the error to the “Standards Issues Database” for inclusion in the next SAR submitted to revise the associated standard.</p>
Standards Committee	Review the proposed errata modification and determine if it qualifies as errata as defined above. The Standards Committee may seek the opinion of a technical committee. If approved as errata, direct staff to post the clean and red line versions of the standard for a 30-day comment period.
Standards Process Manager	<p>If the Standards Committee authorizes posting for stakeholder comment:</p> <ul style="list-style-type: none"> – Post the clean and redline versions of the standard for a 30-day comment period. – Identify the posting as an errata change and ask stakeholders if they agree that the proposed modification is immaterial and if they support the modification. – Provide timetable including when the board will act on the errata.
Stakeholders	Provide comments on proposed errata. If stakeholders do not support the revision as errata they should include reasons why they believe the change is material or does not qualify as errata.

Standards Committee's Process Subcommittee	Prepare responses to stakeholder comments and submit with a recommendation to the Standards Committee for review and action.
Standards Committee	Review Process Subcommittee recommendation and determine whether to make further modifications to the draft standard and post again if necessary, seek the opinion of a technical committee, or authorize moving the errata forward for board adoption and filing with regulatory authorities.
Director, Standards	Submit the revised standard and errata to the board for its approval.
Board of Trustees	The board shall adopt or reject the revised standard as errata, but may not modify the proposed reliability standard. If the board chooses not to adopt the revised standard, it shall provide its reasons for not doing so.
Standards Administrator	Modify the board approved version of the standard to include the approved correction, update the standard's version number and send a notice of the approval and associated modification to the standards list servers.
Director, Standards	Submit the revised standard and errata to applicable regulatory authorities for approval.
Standards Administrator	Once approval is received from applicable regulatory authorities, modify applicable regulatory approved version and send a notice to the standards list servers.

Exhibit C

Comments Received to the Errata Posting

Comments on Reliability Standards Errata

The Standards Committee thanks all commenters who submitted comments on the various Reliability Standards errata. NERC posted the errata for a 30-day comment period from February 2, 2009 through March 2, 2009 to provide stakeholders an opportunity to identify any material impacts associated with the errata that staff may have missed. The stakeholders were asked to provide feedback on the errata through a special Electronic Standard Comment Form. There were 20 sets of comments, including comments from over 60 different people from approximately 40 companies representing 7 of the 10 Industry Segments as shown in the table on the following pages.

http://www.nerc.com/filez/standards/Standards_Errata.html

Based on the comments received, the Standards Committee's Process Subcommittee is recommending that the Standards Committee approve moving already identified corrections to the following standards forward for adoption by the Board of Trustees with the additional change to MOD-021-0 Requirement R1 to show the possessive version of all of the responsible entities.

- IRO-006-4 — Reliability Coordination — Transmission Loading Relief
- MOD-021-0 — Documentation of the Accounting Methodology for the Effects of Controllable Demand-Side Management in Demand and Energy Forecasts
- PER-001-0 — Operating Personnel Responsibility and Authority
- TPL-006-0 — Data From the Regional Reliability Organization Needed to Assess Reliability

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

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

Index to Questions, Comments, and Responses

1. There are four approved NERC standards that contain errors that have been identified as errata. If you disagree with this determination, please identify the specific standard that includes the errata, and the material impact of not accepting the error as errata. 6

Consideration of Comments on Various Reliability Standards Errata

Commenter	Organization	Industry Segment																																																						
		1	2	3	4	5	6	7	8	9	10																																													
2. Gerald Beckerle	Ameren	SERC	1, 3, 5																																																					
3. Louis Slade	Dominion Virginia Power	SERC	5																																																					
4. Jalal Babik	Dominion Virginia Power	SERC	5																																																					
5. Robert Thomasson	Big Rivers Electric Cooperative	SERC	1, 3, 5																																																					
6. Jason Marshall	Midwest ISO	SERC	2																																																					
7. Wayne Pourciau	Georgia System Operations Corporation	SERC	1, 3, 5																																																					
8. Jack Kerr	Dominion Virginia Power	SERC	1																																																					
4.	Ben Li	IRC Standards Review Committee			x																																																			
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6.	Russell A. Noble	Cowlitz County PUD				x																																																		
7.	Alan Gale	City of Tallahassee (TAL)		x		x		x																																																
8.	Kirit Shah	Ameren		x		x		x	x																																															
9.	Jianmei Chai	Consumers Energy Company				x	x	x																																																
10.	Kris Manchur	Manitoba Hydro		x		x		x	x																																															
11.	Michael Gammon	Kansas City Power & Light		x		x		x	x																																															
12.	Greg Rowland	Duke Energy Corporation		x		x		x	x																																															
13.	Jason Shaver	American Transmission Company		x																																																				
14.	Tony Kroskey	Brazos Electric Power Cooperative Inc.		x																																																				
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Consideration of Comments on Various Reliability Standards Errata

Commenter		Organization	Industry Segment											
			1	2	3	4	5	6	7	8	9	10		
16.	Dan Rochester	Independent Electricity System Operator		x										
17.	Edward J Davis	Entergy Services, Inc	x		x		x	x						
18.	Jason L. Marshall	Midwest ISO		x										
19.	Jalal Babik	Dominion Resources Inc	x		x		x	x						
20.	James H. Sorrels, Jr	American Electric Power	x		x		x	x						

Consideration of Comments on Various Reliability Standards Errata

1. There are four approved NERC standards that contain errors that have been identified as errata. If you disagree with this determination, please identify the specific standard that includes the errata, and the material impact of not accepting the error as errata.

Yes — I do agree that the noted errors in the reliability standards are correctly identified as errata.

No — I do not agree that the noted errors in the reliability standards are correctly identified as errata.

Summary Consideration: All commenters but one agreed that the noted errors in the reliability standards are errata. One commenter indicated disagreement with the correction to IRO-006-04 – however the reason provided does not indicate disagreement that the change would be “errata” – the comment provided indicates disagreement with the concept of including an Internet link in a standard.

Organization	Yes or No	Question 1 Comments:
Consumers Energy Company	No - I do not agree that the noted errors in the reliability standards are correctly identified as errata.	The changes recommended in the Errata are very minor and administrative in nature, we would support these changes, except for changes in IRO-006-04, which includes an Internet link to a WECC document. Our suggestion is that we do not include an Internet link to an actual document in the standard since the link is broken and the document could also be changed later on with a new Internet address.
Response: The standard already included Internet links, so the proposed change is not adding a link where there had been none – the proposed change is to replace the incorrect link with the correct link. Since most commenters agreed that the proposed change is “errata” the Process Subcommittee will recommend that the change be adopted as errata.		
Entergy Services, Inc	Yes - I do agree that the noted errors in the reliability standards are correctly identified as errata.	In addition to the changes identified above we suggest the entities in the first line of R1 of MOD-021 be written in the possessive: Load-Serving Entity's and Transmission Planner's.
Response: You are correct, and the proposed revisions are grammar corrections and do not change the requirement and thus will be made.		
SERC OC Standards Review Group	Yes - I do agree that the noted errors in the reliability standards are correctly identified as errata.	The SERC OC Standards Review Group supports the determination of the Standards Committee that the errors noted in the above approved standards are errata.
IRC Standards Review	Yes - I do agree that the noted errors in the reliability standards are correctly	We support these errata changes.

Consideration of Comments on Various Reliability Standards Errata

Committee	identified as errata.	
NPCC	Yes - I do agree that the noted errors in the reliability standards are correctly identified as errata.	
Bonneville Power Administration	Yes - I do agree that the noted errors in the reliability standards are correctly identified as errata.	
Southern Company	Yes - I do agree that the noted errors in the reliability standards are correctly identified as errata.	
Cowitz County PUD	Yes - I do agree that the noted errors in the reliability standards are correctly identified as errata.	
City of Tallahassee (TAL)	Yes - I do agree that the noted errors in the reliability standards are correctly identified as errata.	
Ameren	Yes - I do agree that the noted errors in the reliability standards are correctly identified as errata.	
Manitoba Hydro	Yes - I do agree that the noted errors in the reliability standards are correctly identified as errata.	
Kansas City Power & Light	Yes - I do agree that the noted errors in the reliability standards are correctly identified as errata.	
Duke Energy Corporation	Yes - I do agree that the noted errors in the reliability standards are correctly identified as errata.	
American Transmission	Yes - I do agree that the noted errors in the reliability standards are correctly identified as errata.	

Consideration of Comments on Various Reliability Standards Errata

Company	Identified as errata.	
Brazos Electric Power Cooperative Inc.	Yes - I do agree that the noted errors in the reliability standards are correctly identified as errata.	
ERCOT	Yes - I do agree that the noted errors in the reliability standards are correctly identified as errata.	
Independent Electricity System Operator	Yes - I do agree that the noted errors in the reliability standards are correctly identified as errata.	
Midwest ISO	Yes - I do agree that the noted errors in the reliability standards are correctly identified as errata.	
Dominion Resources Inc	Yes - I do agree that the noted errors in the reliability standards are correctly identified as errata.	
American Electric Power	Yes - I do agree that the noted errors in the reliability standards are correctly identified as errata.	