Summary Consideration: Based on the comments received, the Coordinate Operations drafting team did not make any changes to IRO-014, IRO-015 or IRO-016.

Nebraska Public Power District NPPD

1. All three of the proposed standards have the exact (word for word) purpose. The purpose in each standard should be modified to reflect the titles and requirements of each of the standards.

2. Existing version 0 standard COM-002-0 has requirements for communication between Balancing Authorities, Transmission Operators and Reliability Coordinators. These requirements have not been replaced by similar requirements in the new standards however they have been deleted in the redline version of COM-002-0.

3. The new requirements in the new standards are not explicit and are a decrease in specificity. For example, IRO-005-0 has a specific requirement related to notification of impacted Reliability Coordinators of SOLs and IROLs. The new standard addresses this requirement in a generic manner.

Response:

1. There is no requirement to have a unique purpose statement for each standard. The existing purpose statements do provide a reason for the associated standard.
2. The requirement recommended for deletion from COM-002 is the requirement for the RC to relay to other RCs information the RC has obtained from BAs and TOPs from within its RC Area. No requirement for communication between other entities has been deleted in the redline version of COM-002.
3. The drafting team does not agree that the new standard should be more specific in requiring notifications be made to other RCs relative to SOLs and IROLs. The suite of proposed standards requires that RCs develop Operating Procedures, Processes or Plans to address Scenarios where the actions in one RC's Area may be impactive to another RCs area and this includes notification of certain SOLs and IROLs. There is another standard under development that deals specifically with IROLs and requires RC to RC notification relative to IROLs. (See IRO-008 R3)

Midwest Independent Transmission System Operator, Inc.
British Columbia Transmission Corporation

We support the intent of this standard, but are somewhat concerned by the administrative requirements embedded in it. Also, there should never be level 3 and level 4 non-compliance for administrative requirements. Also, how do you measure failure to coordinate for "potential" events?

Response: The drafting team does not know which administrative requirements nor which levels of non-compliance you'd like changed. In IRO-016, level one is assigned to the administrative aspects of IRO-016; Level four is assigned for failure to coordinate.

If an RC identifies a potential event that RC must coordinate – its up to the RC to make the decision that there is a potential event.

Alberta Electric System Operator AESO
Avista Corp. Washington Water Power Division AVWP
Bonneville Power Administration Transmission BPAT
Bonneville Power Administration - Power Business BPAP
California Energy Commission
Chelan County PUD CHPM
Sacramento Municipal Utility District SMUD
Salt River Project SRP
Salt River Project SRP
Seattle City Light SCL
Seattle City Light SCL
Sacramento Municipal Utility District SMUD
Southern California Edison SCET
Transmission Agency of Northern California - TANC

Tucson Electric Power Company TEPC
Western Electricity Coordinating Council
I support the standard with the comment that "Reliability Coordinator's System Operators" can be interpreted to mean Reliability Coordinator Personnel in the Western Interconnection
Response: The NERC-approved definition of System Operator is:
An individual at a control center (Balancing Authority, Transmission Operator, Generator Operator, Reliability Coordinator) whose responsibility it is to monitor and control that electric system in real time.

Bonneville Power Administration - Power Business BPAP
Because of the established RC relationships in the west, the language should provide clarification that for the Western Interconnection the phrase "Reliability Coordinator's System Operators" can be interpreted to mean "Reliability Coordinator Personnel".
Response: The NERC-approved definition of System Operator is:
An individual at a control center (Balancing Authority, Transmission Operator, Generator Operator, Reliability Coordinator) whose responsibility it is to monitor and control that electric system in real time.

Grant County PUD No.2 GCPD
Grant commends the team for a well written policy.
Response: Thank you for your comment.

Comments Submitted on the Wrong Ballot
Manitoba Hydro Electric Board MHEB
The proposed Standard FAC-010-1 would result in a weakening of existing Version 0 Standard TPL-003-0 with regard to consideration of credible multiple element contingencies (Category C contingencies).
Response: This is not a comment relative to the balloting of the Coordinate Operations Standards IRO-014, IRO-015 and IRO-016.

OPPD Energy Marketing OPPM
The draft NERC Standard FAC-010-1 is inconsistent with existing NERC Version 0 Standard TPL-003-0 in that FAC-010-1 says that it is applicable to the development of System Operating Limits (SOLs) used in planning (as well as in operations), and it doesn't require consideration of multiple contingencies (in either planning or operations), while TPL-003-0 does require consideration of multiple contingencies in planning. This inconsistency is sufficient reason to vote against the current draft of FAC-010-1. Some might say that it should be obvious that, in the event of an inconsistency between two standards, the more-stringent standard should be used, and that there is therefore no need to modify FAC-010-1. However, the inconsistency should be eliminated to prevent confusion and to prevent a possible weakening of existing standards if people who try to interpret the standards don't use the more-stringent standard. Additionally, OPPD would rather not see FAC-010-1 just modified to require that multiple contingencies be considered in the development of SOLs used for planning while not also requiring them to be considered in the development of SOLs used for operations. It doesn't make sense to have operating standards that are less stringent than the planning standards. Right now, this isn't really a big issue at OPPD because in 2004, the MAPP Operating Subcommittee provided us an interpretation of the MAPP Operating Policies that basically said that, in MAPP, multiple contingencies should be considered in operations in the same way that they are in planning. Now that the MRO is responsible for development of Regional standards rather than MAPP, there is the possibility that this could change. It seems likely that the MRO standards will end up basically the same as the MAPP standards, but we have no guarantee of that. One way of trying to ensure that the MRO standards will require that multiple contingencies be considered in operations would be to vote against approval of draft NERC Standard FAC-010-1 unless it is modified to require that multiple contingencies be considered in operations as well as in planning. Additionally, weak reliability standards in one Region could adversely affect the reliability of another Region, even if that other Region has more-stringent standards. Voting against approval of draft NERC Standard FAC-010-1 unless it is modified to require that multiple contingencies be considered in operations as well as in planning would help ensure that all Regions have standards that are similar to

the MAPP standards with regard to the treatment of multiple contingencies in operations. In summary, OPPD votes against approval of draft NERC Standard FAC-010-1 because it is inconsistent with existing NERC Version 0 Standard TPL-003-0. OPPD will vote against approval of any future revisions of FAC-010-1 that do not require that multiple contingencies be considered in operations.
Response: This is not a comment relative to the balloting of the Coordinate Operations Standards IRO-014, IRO-015 and IRO-016.

October 14, 2005

IESO's SUBMISSION ON NERC STANDARD: "COORDINATE OPERATIONS"

Introduction

The IESO congratulates the Standards Drafting Team for their work in the development of this standard.

IESO's Ballot Position on Coordinate Operations Standard: "NO with Comments"

While recognizing the substantial effort made by the drafting team in developing this standard, we must never the less submit a NEGATIVE ballot (No with comments) in light of the shortcomings noted below.

Comments and Discussion:

The new standard requires coordinated action among Reliability Coordinator's (RC) whenever there is a problem. We agree with this general requirement and recognize that not all problems can be foreseen and articulated in a standard. There is however, one thing that is common to all of the RC's in an Interconnection; frequency. Coordinating an RC response to frequency excursions in the eastern Interconnection is a problem for RC's today and has been for some time. Previous NERC Polices specified a threshold that prompted action by the RC's. Given that frequency is the common currency of reliability and given the problem the industry is having with it, frequency deviation beyond a certain threshold should be explicitly identified as one of the problems that require coordinated RC action.

Discussion:

While the IESO supports the approach taken by the drafting team regarding generalizing the requirements, enabling the Reliability Coordinators (RCs) to define problems and to establish mutually agreed to processes and procedures to take associated actions. We nevertheless believe there is a need to be prescriptive for issues and problems deemed significant that also enables unambiguous compliance monitoring. As an example, the standard specifies that action is required for problems but does not specify the criteria or even the process, by which a threshold for what constitutes a problem, will be established.

This standard envisages an after the fact process which either leaves RC's vulnerable to be found non-compliant to a problem they never thought was a problem or it leaves them with the ultimate defence since there was no definition of what is a problem in the first place. This would make it ineffective for compliance and ineffectual in terms of driving reliable coordinated action consistently. Further, the main requirement (R1) places an obligation on a single RC (the one that identifies a problem) to decide upon a solution to the problem (it is intended to mean that the involved RC's collectively decide on a solution but it is not written that way). Having decided on a solution there seems to be no requirement to implement the solution.

The IESO strongly supports the notion that specific threshold limits on Interconnection frequency deviation combined with time duration, is an important requirement for consistency of applications among RCs and for compliance purposes. It is also a triggering point for associated actions to be taken by Reliability Coordinator. In the absence of such a clause it cannot be ascertained as to what constitutes a problem, when action should be taken and compliance cannot be monitored.

The existing requirement R11 of IRO-005-0, which is being replaced with IRO-016-1: R1, provides the general statement *"If a Frequency Error, time error, or inadvertent problem occurs outside of the Reliability Coordinator (RC) Area, the Reliability Coordinator shall initiate a NERC hotline call to discuss the Frequency error, Time error or Inadvertent Interchange with other Reliability Coordinators……."*. While, the new requirement R1 of IRO-016-1 states "*RC that identifies a potential expected or actual problem that requires the actions of one or more other RCs shall contact the other RCs to confirm a problem and discuss options……."*.
The IESO is of the opinion both statements are too generic and the use of the term "problem" too open ended. The standard specifies what action is required but fails to specify the criteria or even the process, by which a threshold for what constitutes a problem will be established.

Suggestions/Recommendations:

Based on the growing concern of the impacts of Interconnection frequency deviations and associated needs of actions and coordination among RCs, we suggest that a prescriptive clause/specific limit on Interconnection frequency deviation along with a duration of time (either similar to that outlined in previous Policy 9 requirement 4 or similar to NERC Resource Subcommittee Proposed Frequency Monitoring and Response Guidelines) be included in the Coordinate Operation standard IRO-016-1:R1 as follows:

R1. The Reliability Coordinator that identifies a potential, expected, or actual problem that requires the actions of one or more other Reliability Coordinators shall contact the other Reliability Coordinator(s) to confirm that there is a problem and then discuss options and decide upon a solution to prevent or resolve the identified problem.

"For instance if a Reliability Coordinator detects an Interconnection frequency error in excess of +/-0.03 Hz (eastern) and +/-0.05 Hz (western) from scheduled frequency for more than 20 minutes, the Reliability Coordinator is required to initiate a NERC Hotline conference call, or a notification via the RCIS, to determine the Reliability Coordinator Area with the energy emergency or control problem."

Alternatively:

We recommend that Triggers and Benchmarks and **associated actions** similar to those outlined in the NERC Resource Subcommittee Proposed Frequency Monitoring and Response Process/Guidelines (that are part of the field trial test for Balance Resources and Demand) should be included in the requirement R1 of IRO-016-1:R1.

Conclusion

Once again, we thank the standards drafting team for their efforts and commend the team for the many improvements this standard incorporates.

The IESO appreciates the opportunity to table these comments and looks forward to participating further in the standards development process.

Response: The Balance Resources and Demand standards currently undergoing field testing sets acceptable operating boundaries and those boundaries are frequency dependent.