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Consideration of Comments on Coordinate Operations Implementation Plan

Our goal is to give every comment serious consideration in this process. If you feel that your comment has been overlooked or there has been an error or omission in the process, please contact Mark Ladrow at 609-452-8060 or at mark.ladrow@nerc.net . You may submit an appeal in accordance with the [Reliability Standards Appeals Process](#)

1. Do you agree with modifying Reliability Standard COM-002-0_R2 and retiring COM-002-0_R2.1, R2.2, R2.3 coincident with the implementation of the Coordinate Operations Standards?

Commenter	Yes	No	Comment	Response
NYISO Michael Calimano		X	IRO-p14-1_R1 does not give specific guidance on what triggers are notification requirement and may lead to different interpretations. COM-002-0R2.1, R2.2, R2.3 offer some specific to conditions where the RC notifies other RC's. These specific conditions and additional notification trigger requirements should be added to IRO-p14-1_R1.	<p>IRO-014 requires the RC to have procedures – and IRO-015 requires the RC to follow those procedures.</p> <p>IRO-014 does identify a minimum list of topics that must be addressed by the RC's procedures – and this list includes all of the topics identified in COM-002 R2.1, R2.2 and R2.3.</p> <p>Under the proposed IRO-014 R1 the conditions for a minimum set of processes, procedures and plans are established – its up to the RCs to establish the specificity of these documents as long as the documents address the minimum elements identified. If the RC's determine there is a need for a North American threshold for taking action, or an Interconnection-wide threshold for taking action, then its up to the RCs to include this in their documents.</p>
Entergy Services Inc Narinder K. Saini		X	<p>Requirements R2, R2.1, R2.2, and R2.3 of COM-002-0 deal with communication between Balancing Authorities and Transmission Operators with their Reliability Coordinators, whereas, the Coordinate Operations standards (IRO-014-1 and IRO-015-1) are applicable to Reliability Coordinators for communication with other Reliability Coordinators. If the responsibility of communication using the Interconnection-wide telecommunication system is assigned to Reliability Coordinator, the Requirement R2 should be modified to reflect that the Reliability Coordinator conveys the information and Requirements R2.1, R2.2, and R2.3 should be retained as these are applicable to Balancing Authorities and Transmission Operators.</p> <p>Entergy suggests the following words be added to R2 "...conveyed to others in the</p>	<p>While the first sentence in COM-002 R2 is clear about what 'function' is responsible for the task, the second sentence doesn't identify any function as being responsible for the task. The second sentence states: "The following information shall be conveyed to others in the Interconnection via an Interconnection-wide telecommunications system."</p> <p>The only 'function' that has access to an 'Interconnection-wide telecommunications system' is the Reliability Coordinator. Balancing Authorities and Transmission Operators don't have access to an 'Interconnection-wide telecommunication system'.</p> <p>Each RC must have operating processes, procedures and plans in place to address RC to RC communications.</p> <p>Modifying COM-002 to address communication within the RC Area is outside the scope of the SAR for this standard.</p>

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			Interconnection by the Reliability Coordinator via an...".	
Tennessee Valley Authority Kathleen A. Davis	X			
Operating Reliability Working Group Mike Gammon – KCP&L Allen Klassen – Westar Serhiy Kotsan – Boston Pacific Pete Kuebeck – OG&E Scott Moore – AEP Bill Nolte – SECI Robert Rhodes – SPP Bary Warren – EDE Norman Williams - SECI	X			
Southern Company – Transmission Marc M. Butts Raymond Vice Keith Calhoun Jim Busbin Jim Viikinsalo Doug McLaughlin Jim Griffith Steve Corbin Tim Swafford	X			
PacifiCorp Robert Williams	X			
IESO Ron Falsetti Khaqan Khani	X			
FRCC Linda Campbell	X			
MACC John Horakh	X			
MRO	X			

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Al Boesch – NPPD Terry Bilke – MISO Robert Coish – MHEB Dennis Florom – LES Ken Goldsmith – ALT Wayne Guttormson – SPC Jim Maenner - WPS Tom Mielnik – MEC Darrick Moe – WAPA Joe Knight – MRO 31 additional MRO Members				
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2. Do you agree with modifying Reliability Standard EOP-002-0_R2 and retiring EOP-002-0_R4 coincident with the implementation of the Coordinate Operations Standards?

Commenter	Yes	No	Comment	Response
Tennessee Valley Authority Kathleen A. Davis	X			
Operating Reliability Working Group Mike Gammon – KCP&L Allen Klassen – Westar Serhiy Kotsan – Boston Pacific Pete Kuebeck – OG&E Scott Moore – AEP Bill Nolte – SECI Robert Rhodes – SPP Bary Warren – EDE Norman Williams - SECI	X			
Southern Company – Transmission Marc M. Butts Raymond Vice Keith Calhoun Jim Busbin Jim Viikinsalo Doug McLaughlin Jim Griffith Steve Corbin Tim Swafford	X			
PacifiCorp Robert Williams	X			
NYISO Michael Calimano	X			
IESO Ron Falsetti Khaqan Khani	X			
FRCC	X			

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Linda Campbell				
Entergy Services Inc Narinder K. Saini	X			
MACC John Horakh	X			
MRO Al Boesch – NPPD Terry Bilke – MISO Robert Coish – MHEB Dennis Florom – LES Ken Goldsmith – ALT Wayne Guttormson – SPC Jim Maenner - WPS Tom Mielnik – MEC Darrick Moe – WAPA Joe Knight – MRO 31 additional MRO Members	X			

3. Do you agree with the Drafting Team that EOP-002-0_R9 should remain in EOP-002-0?

- The 'concept' contained in EOP-002-0_R9 is covered in proposed IRO-014-1_R1.1.2 and IRO-015-1_R1. EOP-002-0_9 requires the Reliability Coordinator to initiate an Energy Emergency Alert under certain conditions – IRO-014-1 and IRO-015-1 require the Reliability Coordinator to have an energy emergency plan and to make notifications to other Reliability Coordinators according to that energy emergency plan, but the proposed standards don't include any specific references to use of the Energy Emergency Alerts. The Drafting Team recommends leaving EOP-002-0_R9 intact because removing that requirement would leave a 'hole' in EOP-002-0.

Commenter	Yes	No	Comment	Response
FRCC Linda Campbell	X		We support this as the declaration of an EEA is not necessarily only communication between RC's. It is important for the entities within a RC area to understand the EEA condition.	The drafting team appreciates your support of its recommendation.
Entergy Services Inc Narinder K. Saini	X		Requirement R9 of EOP-002 is more specific addressing initiation of Energy Emergency Alert whereas the proposed standards are more general requirements for development of plans.	The drafting team appreciates your support of its recommendation.
Tennessee Valley Authority Kathleen A. Davis	X			
Operating Reliability Working Group Mike Gammon – KCP&L Allen Klassen – Westar Serhiy Kotsan – Boston Pacific Pete Kuebeck – OG&E Scott Moore – AEP Bill Nolte – SECI Robert Rhodes – SPP Bary Warren – EDE Norman Williams - SECI	X			
Southern Company – Transmission Marc M. Butts Raymond Vice Keith Calhoun Jim Busbin Jim Viikinsalo Doug McLaughlin	X			

Consideration of Comments on Coordinate Operations Implementation Plan

Jim Griffith Steve Corbin Tim Swafford				
PacifiCorp Robert Williams	X			
NYISO Michael Calimano	X			
IESO Ron Falsetti Khaqan Khani	X			
MACC John Horakh	X			
MRO Al Boesch – NPPD Terry Bilke – MISO Robert Coish – MHEB Dennis Florom – LES Ken Goldsmith – ALT Wayne Guttormson – SPC Jim Maenner - WPS Tom Mielnik – MEC Darrick Moe – WAPA Joe Knight – MRO 31 additional MRO Members	X			

4. Do you agree with retiring IRO-003-0_R2 coincident with the implementation of the Coordinate Operations Standards?

Commenter	Yes	No	Comment	Response
IESO Ron Falsetti Khaqan Khani		X	<p>We do not fully agree with the modification of IRO-003-0_R2 and its conversion to IRO-016-1_R1 as proposed. The IESO recommends requirement R1 of Standard IRO-016-1 be revised to include specific examples.</p> <p>We suggest the following revision in R1 ... " The Reliability Coordinator that identifies a potential, expected or actual problem such as but not limited to declining voltages, excessive reactive flows or an IROL violation, in a neighboring Reliability Coordinator Area, it shall..."</p>	<p>Most commenters agreed with the proposed retirement of IRO-003-0 R2, and the drafting team did not make the recommended change.</p> <p>The standard deliberately avoided being overly prescriptive in listing the specific conditions under which coordination and cooperation were required.</p> <p>By listing specific examples, some entities may incorrectly think these are the only scenarios under which coordination and cooperation are required.</p>
Tennessee Valley Authority Kathleen A. Davis	X			
Operating Reliability Working Group Mike Gammon – KCP&L Allen Klassen – Westar Serhiy Kotsan – Boston Pacific Pete Kuebeck – OG&E Scott Moore – AEP Bill Nolte – SECI Robert Rhodes – SPP Bary Warren – EDE Norman Williams - SECI	X			
Southern Company – Transmission Marc M. Butts Raymond Vice Keith Calhoun Jim Busbin Jim Viikinsalo Doug McLaughlin	X			

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Jim Griffith Steve Corbin Tim Swafford				
PacifiCorp Robert Williams	X			
NYISO Michael Calimano	X			
FRCC Linda Campbell	X			
Entergy Services Inc Narinder K. Saini	X			
MACC John Horakh	X			
MRO Al Boesch – NPPD Terry Bilke – MISO Robert Coish – MHEB Dennis Florom – LES Ken Goldsmith – ALT Wayne Guttormson – SPC Jim Maenner - WPS Tom Mielnik – MEC Darrick Moe – WAPA Joe Knight – MRO 31 additional MRO Members	X			

5. Do you agree with retiring IRO-004-0_R6 and modifying IRO-004-0_R7 coincident with the implementation of the Coordinate Operations Standards?

Commenter	Yes	No	Comment	Response
IESO Ron Falsetti Khaqan Khani		X	The IRO-004-0_R7 should be modified by including few more specifics in IRO-014-1_R1. With regards to modifying IRO-004-R7, we suggest that the listing outlined in IRO-014-1_R1 section R1.1 pertaining to Operating procedures, Processes or Plans be qualified/expanded to include more specifics such as "addressing the potential SOL or IROL violation and an associated need to take any necessary actions..."	The examples provided (SOL and IROL violations) are just two examples of many items that need to be exchanged. The proposed standards deliberately avoided being overly prescriptive in listing the specific conditions under which RC to RC coordination and cooperation were required. By listing specific examples, some entities may incorrectly think these are the only scenarios under which coordination and cooperation are required.
Entergy Services Inc Narinder K. Saini	X		Entergy agrees with retirement of IRO-004-0_R6. Modification of IRO-004-0_R7 is not necessarily as a result of implementation of Coordinate Operations Standard but is a nice improvement. Therefore, Entergy agrees with this modification.	The RCIS is a tool used for communication between RCs and elimination of this requirement is appropriate.
Tennessee Valley Authority Kathleen A. Davis	X			
Operating Reliability Working Group Mike Gammon – KCP&L Allen Klassen – Westar Serhiy Kotsan – Boston Pacific Pete Kuebeck – OG&E Scott Moore – AEP Bill Nolte – SECI Robert Rhodes – SPP Bary Warren – EDE Norman Williams - SECI	X			
Southern Company – Transmission Marc M. Butts Raymond Vice Keith Calhoun	X			

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Jim Busbin Jim Viikinsalo Doug McLaughlin Jim Griffith Steve Corbin Tim Swafford				
PacifiCorp Robert Williams	X			
NYISO Michael Calimano	X			
FRCC Linda Campbell	X			
MACC John Horakh	X			
MRO Al Boesch – NPPD Terry Bilke – MISO Robert Coish – MHEB Dennis Florom – LES Ken Goldsmith – ALT Wayne Guttormson – SPC Jim Maenner - WPS Tom Mielnik – MEC Darrick Moe – WAPA Joe Knight – MRO 31 additional MRO Members	X			

6. Do you agree with modifying Reliability Standard IRO-005-0_R7, IRO-005-0_R9, IRO-005-0_R11, IRO-005-0_R12 and IRO-005-0_R15 coincident with the implementation of the Coordinate Operations Standards?

Commenter	Yes	No	Comment	Response
<p>IESO Ron Falsetti Khaqan Khani</p>		<p>X</p>	<p>re: IRO-005-0_R11 (IRO-016-1_R1). Standard IRO-005-0-R11 now being replaced with IRO-016-1:R1 generically covers a general statement but not the "specific requirements" for actions to be taken for any "Intercondition frequency deviations". We feel that a specific limit on Interconnection frequency deviation with a duration of time may be more appropriate; esp. for consistency and compliance purposes. We recommend that a clause/requirement similar to that outlined in Policy 9 requirement 4 should be added in IRO-016-1 R1 i.e. "INTERCONNECTION frequency error in excess of 0.03 Hz(eastern) for more than 20 minutes requiring a hotline conf call or initiating notification via RCIS. re: IRO-005-0_R15 (IRO-016-1_R1) Similarly, the statements regarding "problems" in R1 of IRO-016-1 should be revised to include few specifics such as SOL or IROl violation, loss of reactive reserves ...etc)</p>	<p>Most commenters agreed with the proposed revisions to IRO-005-0, and the drafting team did not make the recommended change.</p> <p>If the RC's determine there is a need for a North American threshold for taking action, or an Interconnection-wide threshold for taking action, then its up to the RCs to include this in their documents.</p> <p>The proposed standards deliberately avoided being overly prescriptive in listing the specific conditions under which RC to RC coordination and cooperation were required.</p> <p>By listing specific examples, some entities may incorrectly think these are the only scenarios under which coordination and cooperation are required.</p>
<p>Entergy Services Inc Narinder K. Saini</p>		<p>X</p>	<p>Entergy agrees with the modification of Reliability Standard IRO-005-0_R7, IRO-005-0_R9 and IRO-005-0_R12. However, Entergy does not agree with modification of IRO-005-0_R11, All of these requirements in R11 address specific conditions for which Reliability Coordinator should take action. Entergy suggests leaving Requirement IRO-005-0_R11 as it is, or, moving the deleted words from R11 into IRO-016-1_R1 as follows: "...other Reliability Coordinators (e.g. Frequency Error, Time Error, or Inadvertent....with other Reliability Coordinators) shall contact other..." Requirement IRO-005-0_R15 does include use of specific system for communication which can be deleted. Otherwise, there does not appear to be any need to modify these requirements as a result of implementation of Coordinate Operations standards.</p>	<p>Most commenters agreed with the proposed revisions to IRO-005-0, and the drafting team did not make the recommended change.</p> <p>If the RC's determine there is a need for a North American threshold for taking action, or an Interconnection-wide threshold for taking action, then its up to the RCs to include this in their documents.</p> <p>The proposed standards deliberately avoided being overly prescriptive in listing the specific conditions under which RC to RC coordination and cooperation were required.</p> <p>By listing specific examples, some entities may incorrectly think these are the only scenarios under which coordination and cooperation are required.</p>

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MACC John Horakh	X		In the modification of IRO-005-0_R12, do not delete the word <impact> In the modification for IRO-005-0_R15, do not delete the words <without delay>	Agree – 'impact' will not be removed 'Without delay' will not be removed.
Tennessee Valley Authority Kathleen A. Davis	X			
Operating Reliability Working Group Mike Gammon – KCP&L Allen Klassen – Westar Serhiy Kotsan – Boston Pacific Pete Kuebeck – OG&E Scott Moore – AEP Bill Nolte – SECI Robert Rhodes – SPP Bary Warren – EDE Norman Williams - SECI	X			
Southern Company – Transmission Marc M. Butts Raymond Vice Keith Calhoun Jim Busbin Jim Viikinsalo Doug McLaughlin Jim Griffith Steve Corbin Tim Swafford	X			
PacifiCorp Robert Williams	X			
NYISO Michael Calimano	X			
FRCC Linda Campbell	X			
MRO Al Boesch – NPPD	X			

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Terry Bilke – MISO Robert Coish – MHEB Dennis Florom – LES Ken Goldsmith – ALT Wayne Guttormson – SPC Jim Maenner - WPS Tom Mielnik – MEC Darrick Moe – WAPA Joe Knight – MRO 31 additional MRO Members				
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7. Do you agree with modifying Reliability Standard TOP-005-0_R3 coincident with the implementation of the Coordinate Operations Standards?

Commenter	Yes	No	Comment	Response
Southern Company – Transmission Marc M. Butts Raymond Vice Keith Calhoun Jim Busbin Jim Viikinsalo Doug McLaughlin Jim Griffith Steve Corbin Tim Swafford		X	Contractual agreements within the Reliability Area require the Reliability Coordinator to grant permission and access to various systems and then notify the owner of who is receiving data.	The requirement to share information with other RCs exists today. If an RC needs additional time for gathering information and obtaining permission to share that information, then this needs to be arranged in advance and addressed in the RC's procedures, processes or plans.
FRCC Linda Campbell	X	X	It should be retirement of TOP-005-0, R3 not modification.	Agree – this has been corrected.
Tennessee Valley Authority Kathleen A. Davis	X			
Operating Reliability Working Group Mike Gammon – KCP&L Allen Klassen – Westar Serhiy Kotsan – Boston Pacific Pete Kuebeck – OG&E Scott Moore – AEP Bill Nolte – SECI Robert Rhodes – SPP Bary Warren – EDE Norman Williams - SECI	X			
PacifiCorp Robert Williams	X			
NYISO Michael Calimano	X			
IESO Ron Falsetti	X			

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Khaqan Khani				
Entergy Services Inc Narinder K. Saini	X			
MACC John Horakh	X			
MRO Al Boesch – NPPD Terry Bilke – MISO Robert Coish – MHEB Dennis Florom – LES Ken Goldsmith – ALT Wayne Guttormson – SPC Jim Maenner - WPS Tom Mielnik – MEC Darrick Moe – WAPA Joe Knight – MRO 31 additional MRO Members	X			

8. Are you aware of any other Version 0 Requirements that should be retired or revised coincident with the implementation of the set of Coordinate Operations Standards?

Commenter	Yes	No	Comment	Response
IESO Ron Falsetti Khaqan Khani	X		See comment in Q6 above Re: IRO-005_R11 (IRO-016_R1).	See response to Q6.
FRCC Linda Campbell		X	I have not reviewed others with this in mind and am relying on the drafting teams review in this area.	The drafting team did make a good faith effort to review all Version 0 requirements to identify those that were related to the proposed standards.
Southern Company – Transmission Marc M. Butts Raymond Vice Keith Calhoun Jim Busbin Jim Viikinsalo Doug McLaughlin Jim Griffith Steve Corbin Tim Swafford		X	Not at this time.	
Tennessee Valley Authority Kathleen A. Davis		X		
Operating Reliability Working Group Mike Gammon – KCP&L Allen Klassen – Westar Serhiy Kotsan – Boston Pacific Pete Kuebeck – OG&E Scott Moore – AEP Bill Nolte – SECI Robert Rhodes – SPP Bary Warren – EDE Norman Williams - SECI		X		
PacifiCorp Robert Williams	X			

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NYISO Michael Calimano	X			
Entergy Services Inc Narinder K. Saini		X		
MACC John Horakh		X		
MRO Al Boesch – NPPD Terry Bilke – MISO Robert Coish – MHEB Dennis Florom – LES Ken Goldsmith – ALT Wayne Guttormson – SPC Jim Maenner - WPS Tom Mielnik – MEC Darrick Moe – WAPA Joe Knight – MRO 31 additional MRO Members		X		

9. Do you agree that 9 months beyond the date of the Board of Trustees' adoption is sufficient time for entities to meet the requirements and measures in this set of standards?

- If no, please identify any requirement or measure that you feel will require more than 9 months of preparation time and identify what will take longer and how much time you estimate is needed.

Commenter	Yes	No	Comment	Response
MRO Al Boesch – NPPD Terry Bilke – MISO Robert Coish – MHEB Dennis Florom – LES Ken Goldsmith – ALT Wayne Guttormson – SPC Jim Maenner - WPS Tom Mielnik – MEC Darrick Moe – WAPA Joe Knight – MRO 31 additional MRO Members		X	With the number of agreements that the Reliability Coordinators will be required to execute, the subcommittee feels strongly that 9 months is not a sufficient length of time to complete this task. We recommend revision the implementation period to 12 months.	The DT will modify the effective date to be 12 months beyond the date of BOT adoption for all three standards.
PacifiCorp Robert Williams	X		Much of what is in the standard came from the current NERC Policies. The only difficulty I see would be in establishing agreements that may be required between the different entities.	The DT will modify the effective date to be 12 months beyond the date of BOT adoption. This should give everyone enough time to come into full compliance.
FRCC Linda Campbell	X		It seems to be a reasonable time period.	The DT will modify the effective date to be 12 months beyond the date of BOT adoption. This should give everyone enough time to come into full compliance.
MACC John Horakh	X		The answer is <yes> assuming the question meant to say <9 months beyond the effective date>	The Effective Date is the date that entities are required to be compliant.
Tennessee Valley Authority Kathleen A. Davis	X			
Operating Reliability Working Group Mike Gammon – KCP&L Allen Klassen – Westar Serhiy Kotsan – Boston Pacific Pete Kuebeck – OG&E	X			

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Scott Moore – AEP Bill Nolte – SECI Robert Rhodes – SPP Bary Warren – EDE Norman Williams - SECI				
Southern Company – Transmission Marc M. Butts Raymond Vice Keith Calhoun Jim Busbin Jim Viikinsalo Doug McLaughlin Jim Griffith Steve Corbin Tim Swafford	X			
NYISO Michael Calimano	X			
IESO Ron Falsetti Khaqan Khani	X			
Entergy Services Inc Narinder K. Saini	X			

10. Do you have any other comments?

Commenter	Comment	Response
<p>Operating Reliability Working Group Mike Gammon – KCP&L Allen Klassen – Westar Serhiy Kotsan – Boston Pacific Pete Kuebeck – OG&E Scott Moore – AEP Bill Nolte – SECI Robert Rhodes – SPP Bary Warren – EDE Norman Williams - SECI</p>	<p>Reliability Coordinator and Reliability Coordinator Area should be capitalized throughout the proposed standard. IRO-014-1 R4 incorrectly refers to TOP-009-1 R1 and TOP-009-1 R3. Delete the "ext" in the parenthetical phrase in IRO-015-1 M3. The Proposed Effective Date for IRO-016-1 is incorrectly shown as January 1, 2005. The data retention requirements are not consistent throughout the proposed standard. IRO-014-1 and IRO-016-1 require evidence be maintained for the prior year and the current calendar year yet IRO-015-1 requires auditable documentation be maintained for a rolling 12-month period. Shouldn't these requirements be the consistent throughout the proposed standard?</p>	<p>Reliability Coordinator and Reliability Coordinator Area are both capitalized throughout all three proposed standards. The reference to TOP-009 has been corrected. The extra, 'ext' was removed. The proposed effective date was corrected. The data retention requirements are specific to each standard, not to each set of standards. However, the drafting team did review these and agrees that the data retention should be the same for IRO-015 and IRO-016.</p>
<p>IESO Ron Falsetti Khaqan Khani</p>	<p>With regards to Standard IRO-014-1, we suggest that an entity should not be penalized with Level 4 for non-compliance with an administrative issue. The Level 4 is assigned due to a lack of up-to-date revision in documents which may not be appropriate. We suggest deleting the Level 4 statement and/or restricting this up to a maximum level of Level 2. IRO-014-1 requirement R1.1.1 incorrectly refers RAs. It should be corrected to read "..... to be exchanged with other RCs"</p>	<p>Agree – the drafting modified the levels of non-compliance If RA was used, it has been corrected.</p>
<p>FRCC Linda Campbell</p>	<p>I support the implementation plan in general, however have commented on previous drafts of this standard about various needed changes that have still not been made. It appears that Draft 4 that is posted is the same as Draft 3 with only the name change from TOP to IRO and RA to RC. I continue to have trouble with many of the measures identified in IRO-014-1 as they are the exact same things identified in the corresponding requirements. A measure should be a concise statement about how you will measure the requirement, not a regurgitation of the requirement itself. I think that measurements M1.1, M1.1.1-M1.1.6 should be deleted. Also, M1.2 should be changed to M2 to support R2 and measurements M1.2.1 and M1.2.2 should be deleted. By</p>	<p>The current version of IRO-014 has measures that are more explicit than in some other standards, however IRO-014 is not incorrect. There is no industry consensus on how detailed measures should be and the Reliability Standards Process Manual does not provide any additional guidance in this area. M1.2 was changed to M2 as noted.</p>

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	<p>the same logic, M2 should change to M3 and delete measures M2.1-M2.3. I think M3 should be deleted altogether.</p> <p>The measures in IRO-015-1 seem to be ok with the exception of M3. There is no requirement that states a RC has to keep track of when other RC's notify them of a condition. If this is important, perhaps M3 should be made as R4 instead.</p> <p>The only comments the drafting team is looking for right now seems to be on the implementation plan. The industry really has not looked at this draft standard since mid 2004. I think the industry has more experience in what is expected in a requirement and a measure so would suggest perhaps asking for comment on the content of the standard one more time. Even though I support the changes to existing reliability standards and agree with the 9 month timeframe, if this were to go to ballot I would have to vote NO since I do not agree with the Measures and some of the areas in the compliance monitoring section as well.</p>	<p>M3 was removed.</p> <p>SAC already approved moving these standards forward for balloting during the May, 2005 SAC meeting. The process doesn't call for another posting. Additional comments are expected with the first ballot.</p>
<p>Entergy Services Inc Narinder K. Saini</p>	<p>Proposed effective date of Standard IRO-016-1 should be corrected to January 1, 2006. Reference to Reliability Standard TOP-009-1_R1 and TOP-009-1_R3 in Requirement R4 of Standard IRO-014-1 should be corrected to IRO-014-1_R1 and IRO-014-1_R3.</p>	<p>These typographical errors were corrected.</p>
<p>MRO Al Boesch – NPPD Terry Bilke – MISO Robert Coish – MHEB Dennis Florum – LES Ken Goldsmith – ALT Wayne Guttormson – SPC Jim Maenner - WPS Tom Mielnik – MEC Darrick Moe – WAPA Joe Knight – MRO 31 additional MRO Members</p>	<p>It is this subcommittee's opinion that a Level 4 Non-Compliance should be reserved for those infractions that affect the reliability of the interconnected system. We do not feel that it's appropriate to have a Level 4 Non-Compliance for not having the most up to date version of a document. An example of this is the Level 4 non-compliance for procedures to support coordination between Reliability Coordinators Std, IRO-014-1. Therefore we believe that the Level 4 Non-Compliance for this standard should be deleted. An entity should not receive a Level 4 Non-Compliance for an administrative issue.</p> <p>Several of these standards will require significant expenditures of manpower to implement. We feel that it's important to estimate the additional workload and value added prior to implementation.</p> <p>There is a housekeeping issue that the SDT should be aware of:</p> <p>IRO-016-1; The Proposed effective Date at the top of the document show an effective date of January 1, 2005 and the footer of the document show a proposed effective date of January 1, 2006. The date at the top of the document needs to</p>	<p>The drafting team revised the levels of non-compliance for IRO-014.</p> <p>The effective date was modified to be 12 months beyond the BOT adoption date.</p> <p>The typographical errors have been corrected</p>

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	be corrected.	
Southern Company – Transmission Marc M. Butts Raymond Vice Keith Calhoun Jim Busbin Jim Viikinsalo Doug McLaughlin Jim Griffith Steve Corbin Tim Swafford		
PacifiCorp Robert Williams		
NYISO Michael Calimano		
MACC John Horakh		
Tennessee Valley Authority Kathleen A. Davis		