

From: Ed Riley, Chair of the Operate within Interconnection Reliability Operating Limits Standard Drafting Team
To: Tim Gallagher, Director- Standards
Subject: Operating Within System Operating Limits
Date: July 7, 2003

The Operate within Interconnected Reliability Operating Limits Standard Drafting Team (SDT) recently revised its standard. The revisions included dropping most of the requirements originally assigned to the Transmission Operator Function. These requirements were dropped because several commenters indicated that these requirements are either beyond the scope of the SAR or aren't supported by the Functional Model.

- The scope of the SAR is limited to the subset of system operating limits that, if exceeded, could cause instability, uncontrolled separation, or cascading outages that adversely impact the reliability of the bulk transmission system.
- The Functional Model indicates that the transmission operator function is responsible for the system operating limits associated with local network integrity – not the limits associated with the reliability of the interconnected transmission system

The SDT is concerned because one third to one half of the people who submitted comments on the first posting of this draft standard were in favor of these Transmission Operator requirements, even though they aren't supported by either the scope of the SAR or the Functional Model.

For each draft requirement, the SDT asked the question, “Do you agree with this requirement and its associated performance/outcome and measure/s?” The number of “yes” responses is shown after each requirement:

- 202 - The Transmission Operator (TOP) shall monitor (in real time) the system operating limits (identified to prevent instability, uncontrolled separation or cascading outages that adversely impact the reliability of the bulk transmission system) and the actual real time data associated with those limits. (32 yes)
- 204 - The Transmission Operator (TOP) shall specify and collect the data it needs (from its associated Balancing Authorities (BAs), Interchange Authorities (IAs), Generators and Reliability Authority (RA) and other associated TOPs] to maintain the models needed to support real time monitoring and reliability analyses. (52 yes)
- 211 - The Transmission Operator (TOP) shall perform reliability analyses to identify where on its system the TOP may encounter problems that could cause instability, uncontrolled separation or cascading outages that adversely impact the reliability of the bulk transmission system. (35 yes)
- 213 - The Transmission Operator (TOP) shall use the results of real time monitoring and/or reliability analyses to take actions necessary to prevent/mitigate identified problems that could cause instability, uncontrolled separation or cascading outages that adversely impact the reliability of the bulk transmission system. (46 yes)
- 215 - The Transmission Operator (TOP) shall have a documented mitigation plan that identifies actions to be taken to prevent exceeding an identified system operating limit. (64 yes)
- 217 - The Transmission Operator (TOP) shall document instances of exceeding identified system operating limits (40 yes)

With the revised standard, the SDT provided the industry with its reasoning for dropping most of the requirements for the Transmission Operator. On the associated comment form, the SDT asked the question, “Do you agree with the SDT that the redundant requirements for the Transmission Operator should be deleted from this standard?”

The SDT feels as though additional work may be necessary to determine if the industry will support the development of another standard that addresses the subset of system operating limits that are under the direction of the Transmission Operator Function and are not addressed by the Operate Within IROLs Standard. The SDT would like you to bring this matter to the attention of the Standing Committees so they may consider submitting a SAR to address these system operating limits.