

Consideration of Comments on Initial Ballot of IRO-008 – Reliability Coordinator Operational Analyses and Real-time Assessments

Summary Consideration: The drafting team corrected the typographical error in the red line version of IRO-004 – it showed “R7” instead of “R1”.

The SDT also updated the references in the measures for IRO-005 to ensure they reference the correct requirements, using the new requirement numbers.

The drafting team did not make any other modifications based on comments submitted with the initial ballot for this standard.

Organization:	Duke Energy Carolina
Member:	Douglas E. Hils
Comment:	<p>Duke Energy appreciates the opportunity to vote and comment on IRO-008-1. The proposed standard introduces a new defined term “Operational Planning Analysis”, which states that an analysis of the expected system conditions for the next day’s operation may be performed either a day ahead or as much as 12 months ahead. Duke Energy believes that allowing a year is too long.</p> <p>IRO-008-1, IRO-009-1 and IRO-010-1 all introduce new terms that are not defined in the NERC Glossary. “Operations Planning”, “Same Day Operations” and “Real-time Operations” are used to identify time horizons for requirements.</p>
Response:	<p>In the Functional Model, the distinction between planning for operations and planning for system additions is the “one year” mark. The proposed definition for Operational Planning Analysis was supported by most commenters.</p> <p>The definitions used in the “Time Horizons” are not in the NERC Glossary but were posted with the standard when Time Horizons were added to the standard. Here is a link to that comment form: http://www.nerc.com/docs/standards/sar/IROL_Comment_Form_02Jan07.doc</p> <p>Note that the definitions for the terms used in defining “Time Horizons” have been posted for stakeholder reference when each drafting team has added “Time Horizons” to requirements. Here are the definitions:</p> <ul style="list-style-type: none"> - Long-term Planning: a planning horizon of one year or longer. - Operations Planning: operating and resource plans from day-ahead up to and including seasonal. - Same-day Operations: routine actions required within the timeframe of a day, but not real-time. - Real-time Operations: actions required within one hour or less to preserve the reliability of the bulk

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	<p>electric system.</p> <ul style="list-style-type: none"> - Operations Assessment: follow-up evaluations and reporting of real time operations.
Organization:	Great River Energy
Member:	Gordon Pietsch
Comment:	GRE recognizes the need to have measurable requirements. However, it is GRE's opinion that the revised IRO-008-1_R1 language does not adequately address the need for the Reliability Coordinator to pay attention to how the actions they take for their area can affect their neighboring Reliability Coordinator areas. GRE recommends that measurable language that addressing this be added back into the standard.
Response:	<p>Stakeholder consensus is that R2 in IRO-004-1 is un-measurable - it is difficult to measure terms such as, "pay particular attention to" or "undue burden" in an objective manner.</p> <p>Project 2006-06 - Reliability Coordination addresses requirements for coordination between Reliability Coordinators. There is an existing set of requirements (IRO-014-2) for Reliability Coordinators to coordinate with their actions with other Reliability Coordinators. In addition, there are other requirements for the Reliability Coordinator to coordinate with other Reliability Coordinators.</p>
Organization:	FirstEnergy Energy Delivery, FirstEnergy Solutions
Member:	Robert Martinko, Joanne Kathleen Borrell, Kenneth Dresner, Mark S Travaglianti
Comment:	<p>FirstEnergy Corp. appreciates the hard work of the Standard Drafting Team on the challenging task of reorganizing and enhancing the verbiage of the IROL requirements. We vote AFFIRMATIVE to standard IRO-008-1 and ask that the SDT consider our enclosed comments.</p> <p>Comments on EOP-001, IRO-002, IRO-004, IRO-005, TOP-003, TOP-005, and TOP-006:</p> <p>General – The Violation Risk Factors should be added to the text of all of the standards.</p> <p>IRO-004 - VSL table shows "R7" instead of "R1"</p> <p>IRO-005 - Several Measures reference the incorrect requirement numbers</p> <p>TOP-003 - R4 – There is no measure associated with this requirement - Measures do not include evidence of "planning" of scheduled outages per the requirements - VSL for R3 and R4 are incorrect and reference the wrong entity per the requirements</p>
Response:	<p>VRFs will be added to all approved standards as part of another administrative activity.</p> <p>The 'redline' version of IRO-004 did show R7 instead of R1 for the VSL and this has been corrected.</p> <p>The SDT has updated the references in the measures for IRO-005 to ensure they reference the correct requirements, using the new requirement numbers.</p>

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	The SDT is limited in what it can modify in TOP-003. The modifications are limited to revisions and retirements associated with the requirements in the new standards. Other modifications, such as adding missing measures or modifying compliance information, will be addressed by other drafting teams.
Organization:	Lincoln Electric System
Member:	Bruce Merrill, Eric Ruskamp
Comment:	IRO-008-1 and IRO-010-1 R1, R2, & R3. The SDT has taken away the ability of entities to obtain study data from the RC unless the entitie's area specifically expected to take actions for an IROL. The current standard says that we may obtain this data upon request at any time. Entities should be allowed to obtain data from the RC upon request as they do now.
Response:	Note that the implementation plan for IRO-008 only calls for retirement of IRO-004-1, Requirements R1 and R2 – and these requirements do not address data. The comment provided is relevant only to the ballot for IRO-010-1, and is not relevant to the ballot for IRO-008-1. IRO-010-1 does not preclude LES or any other entity from asking for and obtaining data. To the extent the Reliability Coordinator is held accountable for any and all IROLs then the Reliability Coordinator must get what data it needs. If other entities need study data, then this should be addressed in a corollary standard.
Organization:	MidAmerican Energy Co.
Member:	Thomas C. Mielnik
Comment:	Unacceptable or undue Burden requirement needs to be clarified.
Response:	This ballot is for the approval of IRO-008-1 and for the retirement of Requirements R1 and R2 in IRO-004-1 — Reliability Coordination – Operations Planning. The drafting team is not proposing any requirements that include the phrase, “unacceptable or undue burden.”
Organization:	Entergy Services, Inc.
Member:	William Franklin
Comment:	Agree with the content changes, however the format of the Requirements deleted in other standards has resulted in a reassignment of Requirement numbering and thus created an undesirable administrative/logistical situation of entities having to revise associations with Requirement numbers to Requirement verbiage. This also applies to NERC processes as well since, for example, a reference "R2" in an RSAW or a matrix may now be skewed and really be "R1 or R3" if a Requirement was deleted or added.
Response:	This is an administrative issue, outside the drafting team’s scope. The team will forward your comment to

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	the Director of Standards for his consideration.
Organization:	Midwest Reliability Organization
Member:	Larry Brusseau
Comment:	<p>The MRO understands, IRO-004-1 R2 will be retired. Can this requirement be moved to IRO-008-1 (perhaps call it R2)? If this requirement is kept perhaps the "unacceptable or undue Burden" criteria could be clarified. A measurable task would be that the RC has research evidence that it could present plus, it could have measurable evidence like its communication with the local regional reliability organization.</p> <p>For the MRO comments: IRO-008-1 and IRO-010-1 R1, R2, & R3, the SDT have taken away the ability of entities to obtain study data from the RC unless entities area is specifically expected to take actions for an IROL. The current standard says that we may obtain this data upon request at any time. Entities should be allowed to obtain data from the RC upon request as they have now.</p>
Response:	<p>The implementation plan for IRO-008-1 does include the retirement of IRO-004-1 Requirements R1 and R2. Requirement R2 states:</p> <p style="padding-left: 40px;">Each Reliability Coordinator shall pay particular attention to parallel flows to ensure one Reliability Coordinator Area does not place an unacceptable or undue Burden on an adjacent Reliability Coordinator Area.</p> <p>Stakeholder consensus is that R2 in IRO-004-1 is un-measurable - it is difficult to measure terms such as, "pay particular attention to" or "undue burden" in an objective manner.</p> <p>Project 2006-06 - Reliability Coordination addresses requirements for coordination between Reliability Coordinators. There is an existing set of requirements (IRO-014-2) for Reliability Coordinators to coordinate with their actions with other Reliability Coordinators. In addition, there are other requirements for the Reliability Coordinator to coordinate with other Reliability Coordinators.</p>
Organization:	Minnesota Power, Inc.
Member:	Carol Gerou
Comment:	<p>1. On page 7 of 23 of the redlined "Implementation Plan for Operate Within Interconnection Reliability Operating Limits Standards", the already approved standard requirements are IRO-004-1 R1 and R2 while the proposed replacement requirement is IRO-008-1 R1. From what Minnesota Power understands, IRO-004-1 R2 will be retired. Why couldn't this requirement be moved to IRO-008-1 (perhaps call it R2)? If this requirement is kept perhaps the "unacceptable or undue Burden" criteria could be clarified. A measurable task would be that the RC has research evidence that it could present plus, it could have measurable evidence like its communication with the local regional reliability organization.</p> <p>2. On page 10 of 23 of the redlined "Implementation Plan for Operate Within Interconnection Reliability</p>

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	<p>Operating Limits Standards”, the already approved standard requirements are IRO-004-1 R4 & R5 and IRO-005-2 R2 while the proposed replacement requirements are IRO-010-1 R1, R2, & R3 and IRO-008-1 R3. Minnesota Power’s comment to IRO-010-1 R1, R2, & R3 and IRO-008-1 R3 is, “The SDT has taken away the ability of entities to obtain study data from the RC unless entities are specifically expected to take actions for an IROL. The current standard says that we may obtain this data upon request at any time. Entities should be allowed to obtain data from the RC upon request as they have now.”</p>
<p>Response:</p>	<p>Project 2006-06 - Reliability Coordination addresses coordination between Reliability Coordinators. There is an existing set of requirements (IRO-014-2) for Reliability Coordinators to coordinate with their actions with other Reliability Coordinators. Stakeholder consensus is that R2 in IRO-004 is un-measurable - it is difficult to measure terms such as, "pay particular attention to" in an objective manner. In addition, there are other requirements for the Reliability Coordinator to coordinate with other Reliability Coordinators.</p> <p>These IRO standards do not preclude MP or any other entity from asking for and obtaining data. To the extent the Reliability Coordinator is held accountable for any and all IROLs then the Reliability Coordinator must get what data it needs. If the Transmission Operator and Balancing Authority need study data, then this should be addressed in a corollary standard. A Balancing Authority has no study functions regarding IROLS, the only involvement of a Balancing Authority with IROLs is to follow the directive of its Transmission Operators and Reliability Coordinator.</p>