

Entity	Segment	Vote	Comment
Ameren Services Company	1	Affirmative	Include Measurement for each requirement; that is, M1 for R1 and M2 for R2, etc.
Duke Energy Carolina	1	Negative	Duke Energy appreciates the opportunity to vote and comment on this proposed Standard. IRO-009-1 Requirements R1 and R3 indicate that actions shall be implemented to prevent exceeding an IROL. This is an issue of much debate currently within the industry — whether or not IROLs may be exceeded with or without a contingency. It's unclear whether these requirements are consistent with current industry practice. The VSL for IRO-009-1 Requirement R4 introduces a new requirement that an operator document within five minutes of exceeding an IROL that some action was taken to mitigate the magnitude and duration of the event. While we agree with R4 that the operator should act without delay to mitigate the event, we are concerned that this five minute documentation requirement could distract the operator. 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.
FirstEnergy Energy Delivery	1	Affirmative	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-009-1 and ask that the SDT consider our enclosed comments. Requirements R1 and R2 FirstEnergy suggests that the SDT consider the proposed edits to requirements R1 and R2 as shown below to address a potential unintended interpretation of the requirements. We believe the suggested changes remove a level of ambiguity that presently exists and helps clarify the SDT's desired outcome. In requirements R1 and R2 the text uses the phrase "For each IROL (in its Reliability Coordinator Area) that the Reliability Coordinator identifies one or more days prior to the current day ...". Our concern is that the wording "one or more days" is unlimited in timeframe and when performing month ahead, week ahead reviews of requested planned maintenance outages there may be potential IROL conditions identified for system configurations that in actuality never make it to the operating day, based on one or more planned outage requests being denied. Conversely, there may be instances within the day prior to the next operating day, where unexpected forced outages of bulk power facilities trigger the need for re-study. Therefore, it should be clear that the only documented Operating Processes, Procedures, or Plans that are in effect and required by the standard should reflect the most recent system information available prior to the start of the current operating day. FE assumes that there is no expectation that any and all "hypothetical" system configurations reviewed by the Reliability Coordinator would be the basis of any documented Operating Processes, Procedures, or Plans. The standard should be clear in its intent to require IROL mitigation plans be in place based on the most recent projected operating conditions for the next operating day. Therefore, we suggest the addition of the proposed sub-requirement R1.1 and that R2 be deleted and covered by our proposed sub-requirement R1.2. If adopted, some adjustments will also be needed in the text of measures and VSLs. Thank you for your consideration. R1 For each IROL (in its Reliability Coordinator Area) that

Initial Ballot Comments — Project for IROL Standard — IRO-009-1

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			<p>the Reliability Coordinator identifies one or more days prior to the current day, the Reliability Coordinator shall have one or more Operating Processes, Procedures, or Plans that identify actions it shall take or actions it shall direct others to take (up to and including load shedding) that can be implemented in time to prevent exceeding those IROLs. R1.1 The applicable Operating Processes, Procedures, or Plans in effect shall be revised as needed during the 24-hour period preceding the start of the current day period to reflect up to date projected system conditions. R1.2 The applicable Operating Processes, Procedures, or Plans in effect shall mitigate the magnitude and duration of exceeding an IROL such that the IROL is relieved within the IROL's Tv. Comments on EOP-001, IRO-002, IRO-004, IRO-005, TOP-003, TOP-005, and TOP-006: General "The Violation Risk Factors should be added to the text of all of the standards. IRO-004 - VSL table shows "R7" instead of "R1" IRO-005 - Several Measures reference the incorrect requirement numbers 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>
Great River Energy	1	Negative	<p>GRE does not agree with the removal of the references to coordinating with the TOP and BA. GRE understands that under some instances the Reliability Coordinator may not have time to coordinate with the TOP and/or the BA. GRE recommends that the SDT add language that would acknowledge that this coordination must take place during the Operations Planning Time Horizon. In addition, the revised language does not make it sufficiently clear that the BA and TOP in conjunction with the Reliability Coordinator need to be involved in the development of IROL mitigation plans for their systems.</p>
Minnesota Power, Inc.	1	Negative	<p>1. On page 8 of 23 of the redlined "Implementation Plan for Operate Within Interconnection Reliability Operating Limits Standards", the already approved standard requirements are IRO-004-1 R3 &amp; R6 while the proposed replacement requirements are IRO-009-1 R1, R2, &amp; R3. Minnesota Power's comment to IRO-009-1 R2 is, "Any reference to coordinating with the TOP's and BA's has been removed. The TOP's and BA's have the most knowledge of their systems, and Minnesota Power believes they should be involved in mitigation plans, which would include plans for load shedding. They are also the first to be aware of any new SOL's or IROL's."</p> <p>2. On page 8 of 23 of the redlined "Implementation Plan for Operate Within Interconnection Reliability Operating Limits Standards", the already approved standard requirements are IRO-004-1 R3 &amp; R6 while the proposed replacement requirements are IRO-009-1 R1, R2, &amp; R3. Minnesota Power's comment to IRO-009-1 R3 is, "the SDT has removed references to directing the TOP, BA, and TSP to take actions. Minnesota Power believes this should remain."</p>
Consumers Energy	3	Negative	<p>IRO-009-1 discusses having plans or procedures in place when an IROL violation is forecasted before the fact. No where in the Standard does it direct the Reliability Coordinator to inform or communicate with facilities that may be part of such plans or procedures. Failure to coordinate with such facilities could easily invalidate the plans or procedures the RC is putting in place. Generation owners may schedule work or actions at a facility that would render the facility ineffectual if the RC actually implements the plan. No plan is complete without coordination.</p>

Initial Ballot Comments — Project for IROL Standard — IRO-009-1

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FirstEnergy Solutions	3	Affirmative	<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-009-1 and ask that the SDT consider our enclosed comments. Requirements R1 and R2 FirstEnergy suggests that the SDT consider the proposed edits to requirements R1 and R2 as shown below to address a potential unintended interpretation of the requirements. We believe the suggested changes remove a level of ambiguity that presently exists and helps clarify the SDT's desired outcome. In requirements R1 and R2 the text uses the phrase "For each IROL (in its Reliability Coordinator Area) that the Reliability Coordinator identifies one or more days prior to the current day ...". Our concern is that the wording "one or more days" is unlimited in timeframe and when performing month ahead, week ahead reviews of requested planned maintenance outages there may be potential IROL conditions identified for system configurations that in actuality never make it to the operating day, based on one or more planned outage requests being denied. Conversely, there may be instances within the day prior to the next operating day, where unexpected forced outages of bulk power facilities trigger the need for re-study. Therefore, it should be clear that the only documented Operating Processes, Procedures, or Plans that are in effect and required by the standard should reflect the most recent system information available prior to the start of the current operating day. FE assumes that there is no expectation that any and all "hypothetical" system configurations reviewed by the Reliability Coordinator would be the basis of any documented Operating Processes, Procedures, or Plans. The standard should be clear in its intent to require IROL mitigation plans be in place based on the most recent projected operating conditions for the next operating day. Therefore, we suggest the addition of the proposed sub-requirement R1.1 and that R2 be deleted and covered by our proposed sub-requirement R1.2. If adopted, some adjustments will also be needed in the text of measures and VSLs. Thank you for your consideration. R1 For each IROL (in its Reliability Coordinator Area) that the Reliability Coordinator identifies one or more days prior to the current day, the Reliability Coordinator shall have one or more Operating Processes, Procedures, or Plans that identify actions it shall take or actions it shall direct others to take (up to and including load shedding) that can be implemented in time to prevent exceeding those IROLs. R1.1 The applicable Operating Processes, Procedures, or Plans in effect shall be revised as needed during the 24-hour period preceding the start of the current day period to reflect up to date projected system conditions. R1.2 The applicable Operating Processes, Procedures, or Plans in effect shall mitigate the magnitude and duration of exceeding an IROL such that the IROL is relieved within the IROL's Tv. Comments on EOP-001, IRO-002, IRO-004, IRO-005, TOP-003, TOP-005, and TOP-006: General — The Violation Risk Factors should be added to the text of all of the standards. IRO-004 - VSL table shows "R7" instead of "R1" IRO-005 - Several Measures reference the incorrect requirement numbers 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>
Lincoln Electric System	3	Negative	<p>LES does not agree with the removal of the references to coordinating with the Transmission Operators (TOP's) and Balancing Authorities (BA's). The TOP's and BA's have the most knowledge</p>

Initial Ballot Comments — Project for IROL Standard — IRO-009-1

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MidAmerican Energy Co.	3	Negative	Reference to coordinating with TOPs and BAs has been removed from this standard. I believe these entities should be involved in mitigation plans.
Alliant Energy Corp. Services, Inc.	4	Negative	The TOP's and BA's have the most knowledge of their system, and should not be removed from the coordination of mitigation plans.
Consumers Energy	4	Negative	IRO-009-1 discusses having plans or procedures in place when an IROL violation is forecasted before the fact. No where in the Standard does it direct the Reliability Coordinator to inform or communicate with facilities that may be part of such plans or procedures. Failure to coordinate with such facilities could easily invalidate the plans or procedures the RC is putting in place. Generation owners may schedule work or actions at a facility that would render the facility ineffectual if the RC actually implements the plan. No plan is complete without coordination.
City of Tallahassee	5	Negative	R1 and R2 contradict each other. R1 says "to prevent exceeding those IROL". R2 says "to mitigate the magnitude and duration of exceeding that IROL" So R2 says it is okay to violate R1. If that is the case, R1 should not be a standard since it is not needed for the reliability of the BES.
FirstEnergy Solutions	5	Affirmative	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-009-1 and ask that the SDT consider our enclosed comments. Requirements R1 and R2 FirstEnergy suggests that the SDT consider the proposed edits to requirements R1 and R2 as shown below to address a potential unintended interpretation of the requirements. We believe the suggested changes remove a level of ambiguity that presently exists and helps clarify the SDT's desired outcome. In requirements R1 and R2 the text uses the phrase "For each IROL (in its Reliability Coordinator Area) that the Reliability Coordinator identifies one or more days prior to the current day ...". Our concern is that the wording "one or more days" is unlimited in timeframe and when performing month ahead, week ahead reviews of requested planned maintenance outages there may be potential IROL conditions identified for system configurations that in actuality never make it to the operating day, based on one or more planned outage requests being denied. Conversely, there may be instances within the day prior to the next operating day, where unexpected forced outages of bulk power facilities trigger the need for re-study. Therefore, it should be clear that the only documented Operating Processes, Procedures, or Plans that are in effect and required by the standard should reflect the most recent system information available prior to the start of the current operating day. FE assumes that there is no expectation that any and all "hypothetical" system configurations reviewed by the Reliability Coordinator would be the basis of any documented Operating Processes, Procedures, or Plans. The standard should be clear in its intent to require IROL mitigation plans be in place based on the most recent projected operating conditions for the next operating day. Therefore, we suggest the addition of the proposed sub-requirement R1.1 and that R2 be deleted and covered by our proposed sub-requirement R1.2. If adopted, some adjustments will also be needed in the text of measures and

Initial Ballot Comments — Project for IROL Standard — IRO-009-1

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			<p>VSLs. Thank you for your consideration. R1 For each IROL (in its Reliability Coordinator Area) that the Reliability Coordinator identifies one or more days prior to the current day, the Reliability Coordinator shall have one or more Operating Processes, Procedures, or Plans that identify actions it shall take or actions it shall direct others to take (up to and including load shedding) that can be implemented in time to prevent exceeding those IROLs. R1.1 The applicable Operating Processes, Procedures, or Plans in effect shall be revised as needed during the 24-hour period preceding the start of the current day period to reflect up to date projected system conditions. R1.2 The applicable Operating Processes, Procedures, or Plans in effect shall mitigate the magnitude and duration of exceeding an IROL such that the IROL is relieved within the IROL's Tv. Comments on EOP-001, IRO-002, IRO-004, IRO-005, TOP-003, TOP-005, and TOP-006: General</p> <ul style="list-style-type: none"> <li>— The Violation Risk Factors should be added to the text of all of the standards. IRO-004 - VSL table shows "R7" instead of "R1" IRO-005 - Several Measures reference the incorrect requirement numbers TOP-003 - R4</li> <li>— 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</li> </ul>
Lincoln Electric System	5	Negative	<p>LES does not agree with the removal of the references to coordinating with the Transmission Operators (TOP's) and Balancing Authorities (BA's). The TOP's and BA's have the most knowledge of their systems, and LES would think the TOP's and BA's should be involved in mitigation plans, which would include plans for load shedding. They are also the first to be aware of any new SOL's or IROL's. LES does not agree with the removal of references directing the TOP, BA, and Transmission Service Provider (TSP) to take actions.</p>
Entergy Services, Inc.	6	Affirmative	<p>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.</p>
FirstEnergy Solutions	6	Affirmative	<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-009-1 and ask that the SDT consider our enclosed comments. Requirements R1 and R2 FirstEnergy suggests that the SDT consider the proposed edits to requirements R1 and R2 as shown below to address a potential unintended interpretation of the requirements. We believe the suggested changes remove a level of ambiguity that presently exists and helps clarify the SDT's desired outcome. In requirements R1 and R2 the text uses the phrase "For each IROL (in its Reliability Coordinator Area) that the Reliability Coordinator identifies one or more days prior to the current day ...". Our concern is that the wording "one or more days" is unlimited in timeframe and when performing month ahead, week ahead reviews of requested planned maintenance outages there may be potential IROL conditions identified for system configurations that in</p>

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Midwest Reliability Organization	10	Negative	<p>The MRO does not agree with the removal of the references to coordinating with the TOP's and BA's. The TOP's and BA's have the most knowledge of their systems, and the MRO would think the TOP's and BA's should be involved in mitigation plans, which would include plans for load shedding. They are also the first to be aware of any new SOL's or IROL's. The MRO does not agree with the removal of references directing the TOP, BA, and TSP to take actions.</p>