

Unofficial Comment Form for the Third Draft of Standard IRO-006-5 and IRO-006-EAST-1 (Project 2006-08)

Please **DO NOT** use this form. Please use the [electronic comment form](#) located at the link below to submit comments on the current drafts of IRO-006-5 and IRO-006-EI-1. Comments must be submitted by **August 13, 2009**. If you have questions please contact **Andy Rodriquez** at Andy.Rodriquez@nerc.net or by telephone at 609-452-8060.

<http://www.nerc.com/filez/standards/Reliability-Coordination-Transmission-Loading-Relief.html>

Background Information

This is the third draft of the next version of the IRO-006 (Transmission Loading Relief or TLR) standards. With this effort, the drafting team has responded to comments received in the previous posting.

This is one of three phases of Project 2006-08. The first phase, the split of the IRO-006-3 and its associated Attachment 1 into NERC and NAESB standards, was completed and approved by the NERC Board of Trustees on October 23, 2007, and filed with regulatory authorities on December 21, 2007. The second phase, which is intended to address any needed modifications to the standards based on the PJM/MISO/SPP waivers, is currently undergoing field testing. The third phase, which is intended to improve the quality of the standards, is presented here.

The Drafting Team has made revisions to the previously posted work, including:

1. Modified the purpose of IRO-006-5 to more truly capture the intent of the standard
2. Removed the Transmission Operator from the applicability of IRO-006-5
3. Modified the definition of Market Flow
4. Clarified in IRO-006-EAST-1 that if TLR is to be used in response to an actual IROL exceedance, it must be used "prior to or concurrently with" one or more of five other specific listed mitigation actions
5. Clarified that the TLR level criteria in IRO-006-EAST-1 Appendix A are guidelines only
6. Eliminated the requirement in IRO-006-EAST-1 to notify Eastern Interconnection DC Tie Operators of curtailment requests
7. Eliminated the requirement in IRO-006-EAST-1 to allow alternative procedures in response to requests for TLR if those procedures have been pre-approved by the ERO (the team believes this is allowed through the Variance process and does not need special mention in the standard)
8. Removed the requirement in IRO-006-EAST-1 for Reliability Coordinators to request and implement reloads
9. Reinstated TLR Level 6 in IRO-006-EAST-1 Appendix A
10. Made other minor modifications and changes based on comments received during the last posting period

The TLR Drafting Team is seeking comments on these new draft standards.

1. The drafting team has modified the purpose of IRO-006-5 to read:

To ensure coordinated action between Interconnections when implementing Interconnection-wide transmission loading relief procedures to prevent or manage potential or actual SOL and IROL exceedances to maintain reliability of the bulk electric system.

Do you agree with this modified purpose?

- Yes
 No

If no, please explain your answer. Comments: We largely agree with modified purpose statement but believe one additional modification is required. Interconnection-wide contradicts that coordination is needed among Interconnections. We suggest striking Interconnection-wide from the purpose. The purpose should then read:

"To ensure coordinated action between Interconnections when implementing transmission loading relief procedures to prevent or manage potential or actual SOL and IROL exceedances to maintain reliability of the bulk electric system."

2. The drafting team modified Requirement R1 of IRO-006-5 such that it no longer applies to the Transmission Operator. While requests may still be issued by Reliability Coordinators (as is done in the Eastern Interconnection) or Transmission Operators (as the SDT believes is currently done in the West) or Balancing Authorities (which may be done at some point in the future), the SDT believes that the appropriate entities to respond to those requests are either Balancing Authorities or Reliability Coordinators. Additionally, the SDT has removed ambiguous language from the requirement. Do you agree with these modifications?

- Yes
 No

If no, please explain your answer. Comments: We agree with the changes but note an additional clarification is needed. R1 requires the RC and BA to comply with a curtailment request "unless it provides a reliability reason that it cannot comply with the request." The reader could infer that this reason must be provided to the issuing RC but the requirement does not explicitly state this. Further, the BA may provide the reason to its RC (assume this RC did not issue TLR) and rely on that RC to communicate it to the issuing RC.

3. The drafting team has updated the definition of "Market Flow" to read:

Market Flow: the total amount of energy flowing across a specified facility or set of facilities due to a market dispatch of internal generation to serve internal load.

Do you agree with this definition?

- Yes

No

If no, please explain your answer. Comments:

4. The drafting team has updated Requirement R1 of IRO-006-EAST-1 to clarify if TLR is used in response to an actual IROL exceedance, it must be used "prior to or concurrently with" one or more of five other specific listed mitigation actions. Do you agree with this change?

Yes

No

If no, please explain your answer. Comments:

5. The drafting team has modified R2 and Appendix A of IRO-006-EAST-1 to make it clear that the criteria specified for TLR levels are guidelines only, not requirements. Do you believe these modifications make it clear that an RC should **not** be found in violation of R2 if they invoke TLR at a level different than that which the guidelines might recommend?

Yes

No

If no, please explain your answer. Comments: We believe a statement should be added that reads. "TLR levels are neither required nor expected to be issued in numerical order of level. For example, a TLR Level 3a could be issued without issuing any prior TLR Level 1 or 2."

6. The drafting team has eliminated the IRO-006-EAST-1 requirement originally included in R3 to notify the Eastern Interconnection DC Tie Operator of curtailment requests, as the team believes it is no longer needed and is already implicitly addressed in BAL-001. Do you agree this requirement is no longer needed?

Yes

No

If no, please explain your answer. Comments: We agree the requirement was never needed. RC and BA sources and sinks have always been required to be notified. The sink BA is required to notify all on the transmission path including DC tie operators. However, we don't believe anything in BAL-001 implies that this is addressed.

7. The drafting team has eliminated the IRO-006-EAST-1 requirement originally included in R4 that allowed for the use of procedures "pre-approved by the ERO...in lieu of implementing some or all of the requested flow reduction actions." The drafting team believes that the process for Variances has replaced the pre-approval of the ERO, and no special process currently exists for acquiring pre-approval save the Variance process. Do you agree that this allowance is no longer needed?

Yes

No

If no, please explain your answer. Comments: We agree with the removal. However, we do not believe a variance is necessary in all cases. Fortunately, the drafting team has left R4 flexible enough that the RC can take other action. However, we believe

additional modification is necessary to improve this flexibility and reduce compliance burden. We believe that bullets under the implementing an alternate reliability action need to be modified. Analysis is one way to demonstrate that the congestion management actions will be ineffective or result in a reliability concern or adversely affect reliability. However, it is not the only way and this could imply that the RC now has to have a documented study defending their actions. The RCs operational experience and judgment is likely enough reason to take an alternate action. We suggest that the drafting modify these bullets to make clear that the bottom line is the result needs to be equally effective and as long as actual results demonstrate this, no analysis is necessary.

8. The drafting team has eliminated the concept of “reloading” from IRO-006-EAST-1. Reliability Coordinators do not direct reloads; they allow them to occur if the operating conditions permit and transmission customers so desire. Accordingly, the team does not believe any requirement to issue reloads is needed. Do you agree that requiring reloads is not needed in the Reliability Standard?

Yes

No

If no, please explain your answer. Comments: We agree that Reloads are not a reliability issue and therefore do not belong in the reliability standards.

9. Please provide any other comments (that you have not already provided in response to the questions above) that you have on the proposed standards.

Comments: We are concerned that reliability reason is the only reason allowed for not complying with R1 in IRO-006-5. Unfortunately, the IDC allows an RC to issue a TLR that requires curtailments in the past and we have actually received requests for curtailments with effective times that are in the past. R1 could be modified to allow other reasons for not complying with the request such as this or another requirement could be written that requires a reasonable lead time on issuing TLRs and expected time of implementation of cuts.

Since this standard is for the Eastern Interconnection only, we ask the SDT to write the Measurements to consider presentation of IDC logs and screens as satisfactory evidence. Specifically, we ask the drafting team to modify M2 and M3 IRO-006-EAST-1 to clarify that providing the TLR history from the IDC will satisfy the evidence requirements.

Since no RC ever issues a TLR without the IDC, we ask the SDT to write the requirements with consideration of the use of the IDC. For example, R3 should be clarified that the IDC can be relied upon to communicate the notifications. The RC should not be required to demonstrate that the notifications went out as appropriate or essentially that the IDC worked as design.

We suggest the wording for the third sub-bullet under the first bullet of IRO-006-EAST-1 R4 be changed from:

“provide the Market Flow schedule changes”

to:

“achieve the Market Flow relief obligations”.

Provide could be misinterpreted.

In IRO-006-EAST-1 R5, the words “as soon as possible but not more than” are problematic from a compliance perspective. How do you prove you did it as soon as possible? If you could have done it 5 seconds sooner, this could be construed as a violation unnecessarily. We suggest changing this phrase to “within”.

With regard to IRO-006-EAST-1 R5, there needs to be a documented exemption for tool performance issues. Often there is a 3 minute latency for receiving TLR curtailments from the time they are issued. This leaves only 7 minutes for the RC to review, determine impacts, communicate internally and with the initiating RC, if necessary, to make alternate arrangements, and acknowledge the curtailments. Similarly, it should be stated that initiating discussions with the initiating RC regarding the curtailments counts as acknowledgement. R5 needs to be further modified to allow 15 minutes rather than 10 for acknowledgement.