

Comment Form for First Posting of SAR and Standard to Modify IRO-004-0

Please use this form to submit comments on the Interchange Distribution Calculator Working Group's first draft of the SAR and standard for modifications to IRO-004-0. Comments must be submitted by **April 3, 2006**. You must submit the completed form by e-mailing it to sarcomm@nerc.com with the words "IRO-004-IDCWG" in the subject line. If you have questions please contact Mark Ladrow at mark.ladrow@nerc.net or 609.452.8060.

ALL DATA ON THIS FORM WILL BE TRANSFERRED AUTOMATICALLY TO A DATABASE.

DO: **Do** enter text only, with no formatting or styles added.
Do use punctuation and capitalization as needed (except quotations).
Do use more than one form if responses do not fit in the spaces provided.
Do submit any formatted text or markups in a separate WORD file.

DO NOT: **Do not** insert tabs or paragraph returns in any data field.
Do not use numbering or bullets in any data field.
Do not use quotation marks in any data field.
Do not submit a response in an unprotected copy of this form.

Individual Commenter Information		
(Complete this page for comments from one organization or individual.)		
Name:		
Organization:		
Telephone:		
E-mail:		
NERC Region		Registered Ballot Body Segment
<input type="checkbox"/> ERCOT	<input type="checkbox"/>	1 — Transmission Owners
<input type="checkbox"/> FRCC	<input type="checkbox"/>	2 — RTOs, ISOs, Regional Reliability Councils
<input type="checkbox"/> MRO	<input type="checkbox"/>	3 — Load-serving Entities
<input type="checkbox"/> NPCC	<input type="checkbox"/>	4 — Transmission-dependent Utilities
<input type="checkbox"/> RFC	<input type="checkbox"/>	5 — Electric Generators
<input type="checkbox"/> SERC	<input type="checkbox"/>	6 — Electricity Brokers, Aggregators, and Marketers
<input type="checkbox"/> SPP	<input type="checkbox"/>	7 — Large Electricity End Users
<input type="checkbox"/> WECC	<input type="checkbox"/>	8 — Small Electricity End Users
<input type="checkbox"/> NA – Not Applicable	<input type="checkbox"/>	9 — Federal, State, Provincial Regulatory or other Government Entities

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Group Comments (Complete this page if comments are from a group.)			
Group Name:	Midwest Reliability Organization (MRO)		
Lead Contact:	Pam Oreschnick		
Contact Organization:	MRO (XEL)		
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Additional Member Name	Additional Member Organization	Region*	Segment*
Al Boesch	NPPD	MRO	2
Terry Bilke	MISO	MRO	2
Robert Coish	MHEB	MRO	2
Dennis Florum	LES	MRO	2
Ken Goldsmith	ALT	MRO	2
Todd Gosnell	OPPD	MRO	2
Wayne Guttormson	SPC	MRO	2
Darrick Moe, Chair	WAPA	MRO	2
Tom Mielnik	MEC	MRO	2
Dick Pursley	GRE	MRO	2
Dave Rudolph	BEPC	MRO	2
Jim Maenner	WPS	MRO	2
Joe Knight, Secretary	MRO	MRO	2
27 Additional MRO Member	Companies Not Named Above	MRO	2
		MRO	2

* If more than one Region or Segment applies, indicate the best fit for the purpose of these comments. Regional acronyms and segment numbers are shown on prior page.

Background Information

The Interchange Distribution Calculator Working Group (IDCWG) and the Operating Reliability Subcommittee recommend revisions to IRO-004-0 to require that information needed by Eastern Interconnection reliability coordinators, transmission operators, and balancing authorities to perform next day operational analysis, shall be submitted in the next hourly system data exchange update. This is a change from the current practice which requires that Eastern Interconnection data be provided by 1200 Central Standard Time. The purpose of this change is to improve the reliability of system studies. Conforming changes were made to the levels of non-compliance. No changes were made to the data submittal timing requirements for the Western Interconnection.

The following footnote was added to clarify the scope of data that is required to be provided:

A critical Facility as defined in this standard shall be any bulk electric Facility that may be adversely affected by a Contingency in another system or if a SOL or IROL exists for the Facility. At a minimum the critical Facility statuses shall include:

1. Any transmission equipment 100 kV and above
 2. Any generation Facility 20 MW and above
1. Do you agree with the SAR and the proposed revision to IRO-004 to require that information needed for Eastern Interconnection system studies be provided with the next hourly system data exchange? If not, please explain why you disagree.

Yes

No

Comments: Once a day may be not often enough, but hourly may be too often in order to be able to turn around studies. We recommend every four-six hours, which would capture ramp-ups, peaks, valleys, and ramp-downs.

This Standard and its Compliance Matrix is geared primarily for the Reliability Coordinator. We understand that the applicable entities need to provide the information to the RC to perform studies and the RC may delegate this responsibility back to those entities, but this Standard is only applicable to the RC, not the other entities listed. R4 and R8 should be revised to reflect the RC requirements.

The changes being proposed affect the entities that are responsible for providing the data to their Reliability Coordinator. However, looking at the Standard there is no measure or non-compliance level pertaining to the entities not supplying their data in a timely manner. We recommend that appropriate measure(s) and non-compliance level(s) be added.

2. Do you agree with the language in the proposed footnote in IRO-004 to clarify the scope of data that must be provided for system studies? If not, please explain why you disagree.

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Yes

No

Comments: Because of cyber security standards 1300 series, we recommend using a term other than "Critical Facilities" in defining facilities that may be adversely affected by a Contingency.

The definition of a critical facility is inconsistent with other standards and should be changed. We understand the need to update facilities greater than 100kV and 20 MW, however these facilities are not necessarily critical to the operation of the Bulk Electric System. Remove the reference to critical facilities. We suggest using a term like Required Reporting Facilities.

R4 is clear in defining who provides the updated data to the Reliability Coordinator but it is not clear who provides the data to the SDX. Clarify R4 by assigning the responsibility for updating SDX data to the Reliability Coordinator.

3. Do you agree with the Implementation Plan for IRO-004? If not, please explain why you disagree.

Yes

No

Comments: The section that addresses who must comply with the proposed revisions is incorrect. It says that revisions made do not affect the Reliability Coordinator. This is not true because the Reliability Coordinator will have to update SDX data on a more frequent basis.

In general, the MRO supports the proposed concept and feel that with the appropriate changes it could support a revised Standard.