

Comment Form — IROL Standards

Please use this form to submit comments on the proposed IROL standards. Comments must be submitted by **February 15, 2007**. You may submit the completed form by e-mail to sarcomm@nerc.com with the acronym "IROL" in the subject line. If you have questions please contact Maureen Long at maureen.long@nerc.net or by telephone at 609-452-8060.

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 and ISOs
<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
	<input type="checkbox"/>	10 - Regional Reliability Organizations; Regional Entities

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Group Comments (Complete this page if comments are from a group.)

Group Name: Midwest Reliability Organization
Lead Contact: Neal Balu
Contact Organization: MRO for Group (WPS resources for Contact)
Contact Segment: 10
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Additional Member Name	Additional Member Organization	Region*	Segment*
Terry Bilke	MISO	MRO	10
Alan Boesch	NPPD	MRO	10
Robert Coish, Chair	MHEB	MRO	10
Carol Gerou	MP	MRO	10
Ken Goldsmith	ALT	MRO	10
Todd Gosnell	OPPD	MRO	10
Jim Haigh	WAPA	MRO	10
Tom Mielnik	MEC	MRO	10
Pam Oreschnick	XEL	MRO	10
Dick Pursley	GRE	MRO	10
Dave Rudolph	BEPC	MRO	10
Eric Ruskamp	LES	MRO	10
Joe Knight, Secretary	MRO	MRO	10
27 Additional MRO members	Not named above	MRO	10

*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 IROL standards were placed in a holding pattern for two years while waiting for the completion of the standards that require entities to document and use their methodology for developing SOLs and IROLs. FAC-010-1 — System Operating Limits Methodology for the Planning Horizon, FAC-011-1 — System Operating Limits Methodology for the Operations Horizon, and FAC-014-1 — Establish and Communicate System Operating Limits, were all adopted by the NERC Board of Trustees on November 1, 2006. While waiting for these standards to be approved by applicable regulatory authorities, the drafting team has been given the authority to move ahead in refining the set of IROL standards.

Changes to Set of Standards

When last posted, there were seven standards in this set of IROL standards:

- IRO-007 — Monitoring the Wide Area
- IRO-008 — Reliability Coordinator Analyses and Assessments
- IRO-009 — Reliability Coordinator Actions to Operate Within IROLs
- IRO-010 — Reliability Coordinator Data Specification and Collection
- IRO-011 — Providing Data to the Reliability Coordinator
- IRO-012 — Procedures, Processes or Plans for Preventing and Mitigating IROLs
- IRO-013 — Reliability Coordinator Directives Relative to IROLs

Consolidation of Related Requirements

The revised set of standards posted for comment includes only IRO-007 through IRO-010. The drafting team is recommending the following changes to the original set of standards for the reasons stated below:

- Consolidate IRO-010 and IRO-011 into a single standard
- Consolidate IRO-009 and IRO-012 into a single standard
- Transfer IRO-013 to Project 2007-02 — Operating Personnel Communications Protocols

Many stakeholders have indicated that splitting requirements for related tasks across multiple standards leads to cross-referencing between standards that can be confusing — for this reason the drafting team is proposing that the related IROL standards be consolidated to eliminate cross-referencing.

During the drafting work done by the Missing Measures and Compliance Elements Standards Drafting Team, stakeholders indicated that duplication of requirements should be eliminated. In support of these comments, the drafting team recommends moving the requirements from *IRO-013 — Reliability Coordinator Directives Relative to IROLs* into the project that will address communication protocols so that all requirements related to directives will be comprehensively addressed without duplication under the single *Project 2007-02 — Operating Personnel Communication Protocols*.

Conforming Changes to Already Approved Standards

The drafting team reviewed already-approved standards that include requirements for the Reliability Coordinator relative to operating within SOLs or IROLs and is recommending conforming changes to those already-approved standards. The implementation plan provides the justification for each of these recommended changes.

- The drafting team is recommending retirement of most of the requirements assigned to the Reliability Coordinator for real-time operation within SOLs — they should be assigned to the Transmission Operator. Every facility in the Transmission Operator's area has a System Operating Limit, but the Reliability Coordinator isn't required to see all these limits and may not have information to determine the cause of instances of exceeding these limits.
- The drafting team is recommending that requirements that describe possible types of acceptable behavior be replaced with requirements that identify the required performance, as in the case of recommending that IRO-005-2 R3 be retired when IRO-009-1 becomes effective.
- In many cases the drafting team would have recommended additional changes to the requirements in already approved standards, but doing so would be outside the scope of the SAR assigned to this drafting team and the changes can be accomplished when the standards are updated as part of the *Reliability Standards Development Plan: 2007–2009*.

Conforming Changes to Bring Standards into Alignment with Reliability Standards Development Procedure V6 and ERO Rules of Procedure

A new version of the Reliability Standards Development Procedure was approved by the NERC Board of Trustees on November 1, 2006. The drafting team made the following changes to the standards to bring them into conformance with the revised manual or other changes needed to conform to the ERO Rules of Procedure:

1. Modified the format of the "Proposed Effective Dates"

The drafting team modified the proposed effective dates to reflect that the standards cannot become effective until approved by applicable regulatory authorities. The drafting team estimated that it will take approximately three months following Board of Trustee adoption, to obtain regulatory approval from FERC and Canadian authorities.

2. Added Violation Risk Factors to each requirement

Violation risk factors identify the potential impact to reliability when the associated requirement has been violated. The following categories of violation risk factors were approved with the latest version of the Reliability Standards Development Procedure:

A High Risk Factor requirement:

(a) is one that, if violated, could directly cause or contribute to bulk power system instability, separation, or a cascading sequence of failures, or could place the bulk power system at an unacceptable risk of instability, separation, or cascading failures; or

(b) is a requirement in a planning time frame that, if violated, could, under emergency, abnormal, or restorative conditions anticipated by the preparations, directly cause or contribute to bulk power system instability, separation, or a cascading sequence of failures, or could place the bulk power system at an unacceptable risk of instability, separation, or cascading failures, or could hinder restoration to a normal condition.

A Medium Risk Factor requirement

(a) is a requirement that, if violated, could the ability to effectively monitor and control the bulk power system, but is unlikely to lead to bulk power system instability, separation, or cascading failures; or

(b) is a requirement in a planning time frame that, if violated, could, under emergency, abnormal, or restorative conditions anticipated by the preparations, directly affect the electrical state or capability of the bulk power system, or the ability to effectively monitor, control, or restore the bulk power system, but is unlikely, under emergency, abnormal, or restoration conditions anticipated by the preparations, to lead to bulk power system instability, separation, or cascading failures, nor to hinder restoration to a normal condition.

A Lower Risk Factor requirement is administrative in nature and

(a) is a requirement that, if violated, would not be expected to affect the electrical state or capability of the bulk power system, or the ability to effectively monitor and control the bulk power system; or

(b) is a requirement in a planning time frame that, if violated, would not, under the emergency, abnormal, or restorative conditions anticipated by the preparations, be expected to affect the electrical state or capability of the bulk power system, or the ability to effectively monitor, control, or restore the bulk power system.

The drafting team added violation risk factors for each requirement. (For this set of BAL standards, the violation risk factors drafting team provided the violation risk factors already identified by stakeholders. If stakeholders indicate that some of the risk factors posted November 2 through December 1, 2006 need modification, the Balance Resources and Demand Standards Drafting Team will make conforming changes to the risk factors in these standards.)

3. Added a Mitigation Time Horizon to each requirement

The ERO Rules of Procedure include the use of Mitigation Time Horizons as one element used to determine the size of sanctions. The drafting team used the following guidelines in developing mitigation time horizons for each requirement:

- **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 electric system.
- **Operations Assessment:** follow-up evaluations and reporting of real time operations.

4. Changed the identification of the Compliance Monitor

The drafting team modified all references to the Regional Reliability Organization as the Compliance Monitor, and replaced these references with, "Electric Reliability Organization."

5. Deleted Levels of Non-compliance – Added Violation Severity Levels

The drafting team deleted "levels of non-compliance" and added "violation severity levels" to comply with the revised Reliability Standards Development Procedure. Compliance personnel assisted the drafting team in using the following criteria from the manual to establish violation severity levels:

- **Lower:** mostly compliant with minor exceptions — The responsible entity is mostly compliant with and meets the intent of the requirement but is deficient with respect to one or more minor details. Equivalent score: 95% to 99% compliant.
- **Moderate:** mostly compliant with significant exceptions — The responsible entity is mostly compliant with and meets the intent of the requirement but is deficient with respect to one or more significant elements. Equivalent score: 85% to 94% compliant.
- **High:** marginal performance or results — The responsible entity has only partially achieved the reliability objective of the requirement and is missing one or more significant elements. Equivalent score: 70% to 84% compliant.
- **Severe:** poor performance or results — The responsible entity has failed to meet the reliability objective of the requirement. Equivalent score: less than 70% compliant.

6. Added 'Associated Documents' where applicable

The drafting team added a section "F" to the standard called, "Associated Documents" to list items such as forms, related standards, reports, etc.

On the following pages, the drafting team will ask for your feedback on the appropriateness of the changes it made to this set of standards. Because the changes made to the set of standards included a great deal of consolidation, a red line version will not be posted as it is not distinguish the content changes from the format changes when comparing the two versions.

You do not have to answer all questions.

Insert a "check" mark in the appropriate boxes by double-clicking the gray areas.

1. The drafting team consolidated the requirements for *IRO-010— Reliability Coordinator Data Specification and Collection* and *IRO-011— Providing Data to the Reliability Coordinator* into a single standard to eliminate the cross-reference between the two standards. Do you agree with consolidating the requirements into a single standard? If not, please explain.

Yes

No

Comments: This is a step in the right direction, and the revised IRO-010-1 captures the relevant information related to data collection as reflected in R1.1, R1.3, R1.4, R3. A fewer number of standards to deal with is always better.

2. The drafting team consolidated the requirements for *IRO-009 — Reliability Coordinator Actions to Operate within IROLs* and *IRO-012— Procedures, Processes or Plans for Preventing and Mitigating IROLs* into a single standard to eliminate the cross-reference between the two standards. Do you agree with consolidating the requirements into a single standard? If not, please explain.

Yes

No

Comments: While the description of requirements captures the essence of preventing and mitigating IROLs, it would be helpful for clarity to change the title of the revised IRO-009-1 to Reliability Coordinator actions to operate within IROLs and plans to prevent/mitigate IROLs.

3. The drafting team recommends moving the requirements from *IRO-013 —Reliability Coordinator Directives Relative to IROLs* into the project that will address communication protocols so that all requirements related to directives will be comprehensively addressed under the single *Project 2007-02 – Operating Personnel Communication Protocols*. Do you agree with moving the requirements from IRO-013 into Project 2007-02? If not, please explain.

Yes

No

Comments: Project 2007-02 should have been included with this package for us to consider. The MRO is also concerned that there is a general trend to develop too many requirements and measures, which would become administratively burdensome to the ERO and the entities that must comply.

4. The drafting team is proposing that all standards and conforming changes become effective the first day of the first quarter, three months after regulatory approvals. Do you agree that the proposed effective date will give entities time to become fully compliant? If not, please explain.

Yes

No

Comments: It is difficult to prescribe one time window such as, three months after regulatory approvals. Different Standards might require different implementation times to allow the responsible entities to become fully compliant. For example, for those Standards that require equipment installation, it would take more than 3 months to satisfy the compliance requirements. Moreover, the Standards drafting team is the appropriate body to stipulate how much time is needed after regulatory approvals to become compliant.

5. The drafting team added a Violation Risk Factor for each requirement.

Do you agree with the Violation Risk Factor for each requirement in the proposed standards? If not, please identify any requirement with a violation risk factor you feel is incorrect.

I agree with the proposed Violation Risk Factors

I do not agree with the following Violation Risk Factors:

Comments: For many requirements, the VRFs are overstated. ERO has not given correct directives on how to assign VRFs. In addition, one cannot assign a single VRF for a requirement such as IRO-008-1 R3 that covers both Operational Planning Analysis, and real time assessment. In such instances, IRO -008-1 R3 should be split into two separate requirements, one dealing with Operational Planning Analysis, for which the VRF would be Medium and the other, addressing real time assessment for which the VRF would be High. For IRO-007-1 R2, the VRF should be Medium since not adopting the most conservative value for IROL or its Tv would not result in cascading outages. For IRO-010-1 Requirement R2, the VRF should be Low since it is an administrative item, and all that is needed is that the RC receives the status information.

6. The drafting team added a Mitigation Time Horizon for each requirement.

Do you agree with the Mitigation Time Horizon for each requirement in the proposed standards? If not, please identify any requirement with a time horizon you feel is incorrect.

I agree with the proposed Mitigation Time Horizons

I do not agree with the following Mitigation Time Horizons:

Comments: Mitigation Time Horizons are described near the top of this comment form.

The description of the Mitigation Time Horizons states: The ERO Rules of Procedure include the use of mitigation time horizons as one element used to determine the size of sanctions.

Can the drafting team inform the Registered Ballot Body where the ERO definition of Mitigation Time Horizons can be found along with documentation describing how the mitigation time horizons will be used in determining penalties. Mitigation Time Horizons are not listed as a Performance Element of a Reliability Standard in the Reliability Standards Development Procedure Version 6 adopted by the NERC BOT on November 1, 2006. As such, it does not seem appropriate to include them in any Reliability Standards.

The comment form description of Mitigation Time Horizons further states The drafting team used the following guidelines in developing mitigation time horizons for each requirement, whereas the final statement in the description of the Violation Risk Factors states The following categories of violation risk factors were approved with the latest version of the Reliability Standards Development Procedure. Like the Violation Risk Factors, the categories of Mitigation Time Horizons should also be approved and incorporated into the Reliability Standards Development Procedure in order to ensure that the definitions are consistent for all NERC Reliability Standards.

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The MRO cannot vote to approve a standard that includes Mitigation Time Horizons until the drafting team can produce ERO documented definitions and the documented manner in which the Mitigation Time Horizons will be used to determine penalties.

7. The latest version of the Reliability Standards Development Procedure requires that each standard include “violation severity levels” rather than “levels of non-compliance.” “Violation severity levels” identify how badly an entity violated each requirement, and are not linked to the reliability-related impact of violating a requirement. (The reliability-related impact of violating a requirement is now identified in the “Violation Risk Factor” appended to each requirement.) Note that these severity levels are “guidelines” and variations from the above categories are acceptable.

Do you agree with the violation severity levels for each of the proposed standards? If you disagree with any of the violation severity levels for the proposed standards, please identify the standard and requirement you feel has an incorrect violation severity level.

I agree with the violation severity levels

I do not agree with the following violation severity levels:

Comments: The way the Violation Severity levels are spelled out, it again appears to be arbitrary cut offs, and especially the High and Severe Violation Severity Levels have to be tightly defined so that the entities would know what actions to take to be compliant.

8. The implementation plan modifies several requirements in already approved standards because compliance with those requirements does not seem practical. Every facility in the Transmission Operator’s area has a System Operating Limit, but the Reliability Coordinator isn’t required to see all these limits and may not have information to determine the cause of instances of exceeding these limits — yet there are requirements that hold the Reliability Coordinator accountable for identifying the cause of any actual or potential SOL. The drafting team reviewed these requirements and made proposed modifications to limit the Reliability Coordinator’s accountability for real-time actions relative to SOLs. Do you agree with the drafting team’s approach?

I agree the drafting team’s approach

I do not agree with the drafting team’s approach

Comments:

9. The drafting team is recommending that when IRO-007-1 is approved, conforming changes be made to the following standards:

- IRO-002-1 — RC – Facilities; Retire R6
- IRO-003-2 — RC – Wide Area View; Retire R1 and R2
- IRO-005-2 — RC – Current Day Operations; Retire R1; Convert R1.1 into a Reference; Modify R13 part 2
- TOP-006-1 — Monitoring System Conditions Voltage and Reactive Control; Modify R2

Do you agree with these proposed conforming changes? If not, please identify any conforming change you feel is incorrect.

I agree with the proposed conforming changes

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I do not agree with the following conforming changes:

Comments: The MRO agrees with the SDT in striking the first part of IRO-005-2 since it is already covered in FAC-014-R5.1. However, the MRO does not agree with the proposed revision to the second part that states: The Transmission Service Providers shall respect SOLs and IROLs in accordance with filed tariffs..... Since the RC may not know all SOLs and IROLs, it is not possible for the RC to make the TSP aware of what the RC itself does not know. The MRO recommends the SDT amend the proposed revision to state: The Transmission Service Provider shall respect all KNOWN SOLs and IROLs in accordance with.....

10. The Drafting Team is recommending that when IRO-008-1 is approved, conforming changes be made to the following standard:

- IRO-004-1 — RC – Operations Planning; Retire R1 and R2

Do you agree with these proposed conforming changes? If not, please identify any conforming change you feel is incorrect.

I agree with the proposed conforming changes

I do not agree with the following conforming changes:

Comments:

11. The Drafting Team is recommending that when IRO-009-1 is approved, conforming changes be made to the following standards:

- EOP-001-0 — Emergency Operations Planning; Retire R2
- IRO-004-1 — RC – Operations Planning; Retire R3 and R6
- IRO-005-2 — RC – Current Day Operations; Retire R3, R5, R9; Delete R13 part 1; Modify R14; Retire R16, R17

Do you agree with these proposed conforming changes? If not, please identify any conforming change you feel is incorrect.

I agree with the proposed conforming changes

I do not agree with the following conforming changes:

Comments:

12. The drafting team is recommending that when IRO-010-1 is approved, conforming changes be made to the following standards:

- IRO-002-1 — RC – Facilities; Retire R2
- IRO-004-1 — RC – Operations Planning; Retire R4, R5
- IRO-005-2 — RC – Current Day Operations; Retire R2
- TOP-003-0 — Planned Outage Coordination; Modify R1.2
- TOP-005-1 — Operational Reliability Information; Retire R1, R1.1; Convert Attachment A to a Reference
- TOP-006-1 — Monitoring System Conditions Voltage and Reactive Control; Modify R4

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Do you agree with these proposed conforming changes? If not, please identify any conforming change you feel is incorrect.

I agree with the proposed conforming changes

I do not agree with the following conforming changes:

Comments: The MRO reviewed the implementation plan and it is clear that IRO-010-1 gives the flexibility to specify the data requirements in R1 and the requirement that the functional entities follow them in R3.

13. If you are aware of any conflicts between the proposed standard and any regulatory function, rule order, tariff, rate schedule, legislative requirement or agreement please identify the conflict here. Similarly, if you believe that any requirement in this set of standards has an unnecessary adverse impact on energy markets, please identify the requirement and its adverse impact here.

No known conflicts or unnecessary adverse impacts

Known conflict:

Unnecessary adverse impact on markets:

14. The drafting team is recommending that these standards be balloted with **four separate ballots**, according to the following table. There would be a single ballot for IRO-007-1 that would include approval of IRO-007-1 and approval of the retirement of IRO-002-1 R6, and approval of retirement of IRO-003-2 R1 and R2, etc.

Ballot for:	Includes Associated Changes to Already Approved Standards:
IRO-007	IRO-002-1 — RC – Facilities - Retire R6 IRO-003-2 — RC – Wide Area View - Retire R1 and R2 IRO-005-2 — RC – Current Day Operations - Retire R1; Convert R1.1 into a Reference; Modify R13 part 2 TOP-006-1 — Monitoring System Conditions Voltage and Reactive Control - Modify R2
IRO-008	IRO-004-1 — RC – Operations Planning - Retire R1 and R2
IRO-009	EOP-001-0 — Emergency Operations Planning - Retire R2
	IRO-004-1 — RC – Operations Planning - Retire R3 and R6
	IRO-005-2 — RC – Current Day Operations Retire R3, R5, R9; Delete R13 part 1; Modify R14; Retire R16, R17
IRO-010	IRO-002-1 — RC – Facilities - Retire R2
	IRO-004-1 — RC – Operations Planning

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	- Retire R4, R5
IRO-005-2 — RC – Current Day Operations	- Retire R2
TOP-003-0 — Planned Outage Coordination Modify R1.2	
TOP-005-1 — Operational Reliability Information	- Retire R1, R1.1; Convert Attachment A to a Reference
TOP-006-1 — Monitoring System Conditions Voltage and Reactive Control	- Modify R4

I agree with balloting these standards using four separate ballots

I do not agree balloting these standards using four separate ballots:

Comments:

15. If you have any other comments on this set of standards or its implementation plan that you have not already submitted above, please provide them here.

No additional comments

Comments: The MRO requests clarification as to why the following two definitions were added in IRO-009-1 and never used: Interconnection Reliability Operating Limit Event, and Interconnection Reliability Operating Limit Event Duration. If terms are specifically added to a standard, it is expected that the terms will be used in the standard. If the new terms are not to be used in the standard where they are originally defined, it would appear that the new terms are not needed and should be struck from the standard until a such time that they are to be used.

The MRO requests the definition of the term Delay, as it is used in in IRO-009-1-R4. Is the RC considered in violation if it does not act with in one minute? If it does not act with in two-minutes. Leaving this term undefined will result in arbitrary enforcement of this standard

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Individual Commenter Information		
(Complete this page for comments from one organization or individual.)		
Name:	David L. Folk	
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NERC Region		Registered Ballot Body Segment
<input type="checkbox"/> ERCOT	<input checked="" type="checkbox"/>	1 — Transmission Owners
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<input type="checkbox"/> NA – Not Applicable	<input type="checkbox"/>	9 — Federal, State, Provincial Regulatory or other Government Entities
	<input type="checkbox"/>	10 - Regional Reliability Organizations; Regional Entities