

First Draft of Standard IRO-006-5 and IRO-006-EI-1 for Transmission Loading Relief (Project 2006-08)

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 **December 1, 2008**. If you have questions please contact **Andy Rodriguez** at Andy.Rodriguez@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 next version of the IRO-006 standards. With this effort, the drafting team has attempted to significantly improve the overall quality of the standards.

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, and SPP waivers, is currently undergoing Field Testing. The third phase, which is intended to improve the quality of the standards, is presented here.

The TLR Drafting Team has made significant revisions to the previously approved work:

1. Converted Attachment 1 into a standard solely for the Eastern Interconnection.
2. Transferred requirements from IRO-006 that was primarily focused on Eastern Interconnection practices to the Eastern interconnection TLR standard.
3. Clarified the roles of entities when responding to curtailment requests from other Interconnections.
4. Removed the requirement that entities comply with the INT standards, as it was redundant.
5. Restructured the Eastern Interconnection TLR standard (previously Attachment 1) to be clearer and specify reliability requirements.

The TLR Drafting Team is seeking comments on these new draft standards. Note that these standards do not include measures or compliance elements; these components will be developed at a future point in time.

You do not have to answer all questions. Enter All Comments in Simple Text Format.

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

1. **The drafting team has proposed to remove the NERC definition of Reallocation from the Glossary, as it is already defined in NAESB Business Practices. Do you believe this removal to be appropriate?**

Yes

No

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If “No,” please explain your concerns.

Comments:

2. The drafting team has proposed a new definition for inclusion in the NERC glossary:

Market Flow: the amount of energy flowing across a specified facility or set of facilities due to the operation of a market that has implemented a “Market Flow Calculation” methodology.

Do you agree with the proposed definitions in the standard?

Yes

No

If “No,” please explain your concerns.

Comments: ** what is 'Market Flow Methodology'?

3. The drafting team has moved or eliminated three of the requirements originally in IRO-006-4:

- The drafting team eliminated IRO-006-4 R2, which stated “The Reliability Coordinator shall only use local transmission loading relief or congestion management procedures to which the Transmission Operator experiencing the potential or actual SOL or IROL violation is a party.”
- The drafting team moved IRO-006-4 R3, which stated “Each Reliability Coordinator with a relief obligation from an Interconnection-wide procedure shall follow the curtailments as directed by the Interconnection-wide procedure. A Reliability Coordinator desiring to use a local procedure as a substitute for curtailments as directed by the Interconnection-wide procedure shall obtain prior approval of the local procedure from the ERO.” These concepts were incorporated into the new IRO-006-EI-1.
- The drafting team eliminated IRO-006-4 R5, which stated “During the implementation of relief procedures, and up to the point that emergency action is necessary, Reliability Coordinators and Balancing Authorities shall comply with applicable Interchange scheduling standards.” This language was redundant with the INT standards themselves.

Do you believe these modifications are appropriate?

Yes

No

If “No,” please explain your concerns.

Comments:

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4. The SDT has proposed removing the Regional Differences for MISO, PJM, and SPP, as the language within IRO-006-EI-1 incorporates the concept of Market Flow. Do you agree that these Regional Differences can be removed?

- Yes
 No

If "No," please explain your concerns.

Comments:

5. The drafting team has converted Attachment 1 to a separate standard that is posted with this comment form (IRO-006-EI-1). Do you believe this is appropriate?

- Yes
 No

If "No," please explain your concerns.

Comments:

6. The drafting team has proposed that Attachment 1 be treated as a standard for the Eastern Interconnection (IRO-006-EI-1). Alternatively, the standard may be treated as a continent-wide standard (IRO-017) that is applicable only to entities in the Eastern Interconnection. Do you prefer one approach over the other?

- IRO-006-EI-1
 IRO-017-1

Please provide any thoughts or comments.

Comments: The MRO believes that naming the standard IRO-017-1 stays consistent with the NERC standard naming convention and does not add another element to the standards naming.

7. The drafting team has identified a concern related to compliance with IRO-006-EI-1 and the availability of the IDC or similar technology. To address this, the SDT is considering adding the following language to the IRO-006-5:

R1. A Reliability Coordinator desiring to utilize an Interconnection-wide congestion management procedure shall utilize the appropriate procedure below based on the region in which they oversee reliability, provided the necessary tools to support the procedure are available and in working order:

Do you believe this or similar language is appropriate and necessary?

- Yes
 No

Please provide any thoughts or comments.

Comments:

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- 8. Are you aware of any conflicts between the proposed standard and any regulatory function, rule/order, tariff, rate schedule, legislative requirement or agreement?**

Yes

No

If yes, please explain your answer.

Comments:

- 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: