

Unofficial Comment Form for IRO-006-5 and IRO-006-EAST-1 (Project 2006-08)

Please **DO NOT** use this form. Please use the [electronic form](#) located at the link below to submit comments on the current drafts of IRO-006-5 and IRO-006-EAST-1. Comments must be submitted by **November 30, 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 next version of the IRO-006 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/MISP/SPP waivers, is currently completing Field Testing and did not result in any modifications to IRO-006. 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. Combined IRO-006-EAST-1 R4 and R5 into a single requirement with a 15-minute performance deadline. The deadline was added based on stakeholder suggestions that a time limit be added. The 15 minute duration was chosen based on current practice, which allows for sufficient time to make adjustments to any Interchange Schedules being curtailed. R5, which originally required the Responding RC to respond back to the initiating RC with a summary of actions that would be taken, was determined to be superfluous, as the first bullet would be communicated automatically through schedule changes, while the second bullet already required RC contact and approval.
2. Converted the guideline into a table as part of Requirement R2.
3. Added a sentence to what had been Appendix A Guidelines that states "TLR levels are neither required nor expected to be issued in numerical order of level."

The TLR Drafting Team is seeking comments on the changes to IRO-006-EAST-1.

1. The drafting team has combined IRO-006-EAST-1 R4 and R5 into a single requirement with a 15-minute target to respond to curtailment request. R5, which originally required the Responding RC to respond back to the initiating RC with a summary of actions that would be taken, was determined to be superfluous, as the first bullet would be communicated automatically through schedule changes, while the second bullet requires RC contact and approval already. If no, please explain your answer.

Do you agree with this change?

Yes

No

Comments:

The MRO NSRS largely agrees with the change but some additional modification is needed. We are concerned that a compliance auditor could interpret the first bullet under R4 to require the RC not only to instruct actions to be taken within 15 minutes but also that the actions must be completed within 15 minutes. We believe the bullet should be changed to: "Communicate congestion management actions requested by the issuing Reliability Coordinator as follows". The language in the associated measure would then require modification as well.

2. The drafting team has deleted Appendix A of IRO-006-EAST-1 and instead incorporated the table from the Appendix into requirement R2. The system conditions were relabeled as examples, a footnote was added to explain the role of the table, and a sentence was added that states "'TLR levels are neither required nor expected to be issued in numerical order of level.'" The Drafting Team's intent with this change is to make it clear that entities must use one of the 9 levels, but that it is left solely to the discretion of the RC to determine what level is needed.

Do you believe this has been made clear? If no, please explain your answer.

Yes

No

Comments:

The MRO NSRS agrees the modifications improve the clarity but we feel additional changes need to be made. We are concerned that the footnote may prevent the use of proxy flowgates. We suggest that the footnote should strike "provided the Reliability Coordinator has reliability reasons to take such action" clause at the end of the second sentence. It is not needed and presumes the certification process does not work. By definition an RC that has been certified by NERC can and will only take action for reliability reasons.

3. 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:

A. The MRO NSRS believes that the Applicability Section for IRO-006-EAST-1 needs additional clarity. We suggest the following modification.

4. Applicability

4.1 Reliability Coordinator (RC)

The purpose statement already identifies that this standard is limited to only those RC in the Eastern Interconnection so repeating that in the applicability is unnecessary.

In addition, 4.2 “Responding Reliability Coordinators” can also be deleted because the Applicability section in IRO-006-5 already covers their responsibility.

Examples:

(Statement) An RC in the Eastern Interconnection has to follow both IRO-006-5 and IRO-006-EAST-1 and all other RCs have to comply with IRO-006-5.

(Example 1) If a RC in the Eastern Interconnection (EI) makes a request to an RC not in the Eastern Interconnection, that non EI RC still has to address the request based on R1 in IRO-006-5.

(Example 2) If a non EI RC makes a request to a EI RC, the EI RC has to address the request based on R1 in IRO-006-5

What these examples are demonstrating is that the Applicability Section in IRO-006-EAST-1 only has to identify Reliability Coordinators because any request made to a Reliability Coordinator in a different interconnection has to be addressed because of IRO-006-5.

B. The MRO NSRS is concerned that R2 requires a TLR level 1 to be reissued every hour. Currently, it is not industry practice to re-issue a TLR level 1 every hour because it does not impact E-Tags. Only those levels 2 and higher should require re-issuing every hour.

C. The MRO NSRS continues to be concerned that the measures do not reference the IDC logs in any way as sufficient basis for demonstrating compliance. In response to our last comment on this issue, the SDT responded that industry comments agreed in a previous posting that the standards should not reference any industry specific tool. First, we can find no such record posted on the NERC web site supporting such a statement. Please identify specifically which posting and where in the posting this information is contained. Secondly, assuming that the record does exist, we question what the industry thought they were agreeing to. We believe the industry probably thought they were agreeing that the requirements should not mention the IDC which we agree with. However, including lists of IDC logs in the evidence list in the measures supports clarity in compliance which is a NERC stated goal and does not contradict what industry likely thought they were agreeing to.

If the SDT does not include IDC logs in the evidence lists, then please confirm our following understanding so that there is a record of what the drafting teams intentions were that will be filed with FERC. Is it the intent of the drafting team that IDC logs mentioned in the following example would demonstrate compliance with the requirements? Consider an example where the issuing RC issues a TLR 3A (R2.1), the IDC determines curtailments through its algorithm (R2.2), the IDC communicates to all RCs (R3.1, R3.2, and R3.3), receiving RCs (including the issuing RC) acknowledge the curtailments (assuming no reliability issues), whereupon the IDC communicates tag curtailments, NNL, and market flow relief to affected BAs (R4). Are the IDC and e-tagging records clearly sufficient evidence to prove compliance with the associated requirements in parentheses above? The measures currently are not clear. We are trying to avoid a situation where the RC could not rely on the IDC for evidence and would have to make and document phone calls to every RC and every impacted BA. This would be too burdensome an outcome and would distract the System Operators from their true job ensuring and maintaining reliability.