Ballot Results: Operate Within Interconnection Reliability Operating Limits

Proposed Standard Title: **Operate Within Interconnection Reliability Operating Limits**
Ballot Period: 12/18/03 - 01/06/04
OVERALL RESULT: **Rejected**:

The drafting team will review all comments received and decide whether to recirculate or modify the standard and post it for comment.

Results Chart:

Segment	Ballot Pool	Votes				Abstain	No Ballot
		Affirmative		Negative			
		#Votes	Fraction	# Votes	Fraction	#Votes	
1	75	9	0.129	61	0.871	0	5
2	16	4	0.250	12	0.750	1	-1
3	49	5	0.128	34	0.872	0	10
4	14	2	0.154	11	0.846	0	1
5	37	2	0.057	33	0.943	0	2
6	20	3	0.158	16	0.842	1	0
7	1	0	0.000	1	1.000	0	0
8	1	0	0.000	1	1.000	0	0
9	3	0	0.000	3	1.000	0	0
Totals	216	25	0.876	172	8.124	2	17
Ballots	199	92.1%					
Weighted Vote			0.097				

The weighted segment vote calculation result is listed above. The result must be above .667 for the draft standard to be approved.

Individual Ballots:

All comments filed by organizations that participated in this ballot are noted below. Comments that were posted as documents can be downloaded by clicking on the document name.

View ballot results without comments.

AEP Service Corp -- Transmission System AEP Negative

Transmission Owners

AEP concurrrs with the following comments from SPP.
Not included in original comments:

Tv Tv, which is defined as the maximum time that an Interconnection Reliability Operating Limit (IROL) can be exceeded without compliance sanctions being applied, has no maximum limit. Currently policy requires OSL violations to be corrected within 30 minutes. The proposed standard would allow a Reliability Coordinator to choose what he believes to be an appropriate Tv for each IROL. With no maximum Tv required, there is potential for Reliability Coordinators to choose something much longer than 30 minutes in order to minimize their exposure to a

compliance sanction. Placing no restrictions on how long an IROL can be exceeded is not in the best interest of reliability.

Sanctions with non-compliance:
Sanctions are defined on a per MW basis for violations of operating limits but a more realistic approach would be to base them on percentage violations. Ten MWs on a 115 kV facility is probably more critical than 10 MW on a 500 kV facility although the 500 kV facility may be more critical for interconnection reliability.

From the ORWG's original comments:

201(e)(4) The SDT needs to revisit the levels of non-compliance associated with this standard. If compliance is truly a black/white issue with no shades of gray as the proposed levels indicate, why not have just a level one with no financial penalty? The proposed non-compliance level implies that it may be more important to have a list of IROLs rather than a correct list of IROLs. Also, if no IROLs exist, there will be no list which would cause the reliability authority to be in non-compliant. There needs to be consistency throughout all the standards on documentation-type non-compliance.

202(e) Again the issue of degrees of non-compliance surfaces. Are there shades of gray with non-compliance for this standard or is it strictly a black and white issue? Why jump directly to level four non-compliance? Is progressive non-compliance not an option? For example, if a reliability authority had identified 25 IROLs, he is level four non-compliant if only one of the IROLs is not available for real-time use. Shouldn't there be allowances for such situations? Also, perhaps a letter that lists critical displays and identifies discrepancies would be more beneficial to maintaining interconnection reliability than a monetary penalty.

203(b) The proposed measures may be too weak. For example, it appears that a reliability authority could satisfy the operational planning analysis by evaluating an invalid case for a given day. While it meets the letter of the measure, it doesn't meet the intent of the measure. Also, does (b)(1)(ii) apply to IROLs that are associated with stability limits? If so, this measure would require a reliability authority to run real-time stability analyses every 30 minutes.

203(e) Again the issue of degrees of non-compliance surfaces. Are there shades of gray with non-compliance for this standard or is it strictly a black and white issue? Why jump directly to level three non-compliance? Is progressive non-compliance not an option? Is missing an operational planning assessment one day in a month as detrimental as missing it 10-15 days per month? Similarly, is missing one real-time assessment as bad for reliability as missing these assessments for hours, on a regular basis?

205(e) Requirements (a)(i), (a)(ii) and (a)(iii) are too open-ended on the part of the reliability authority. Justification should be required for all requested data to prevent unreasonable and burdensome requests on the part of the reliability authority. The data requested and the timing of the delivery of the data should be mutually agreeable to the reliability authority and the responding entity.

The standard should include a minimum, default set of data, such as that spelled out in Appendix 4B, and provide that as a guide for types of data that may be requested.

Requirement (a)(iii) appears to be repeated again as a measure in Measure (b)(iii). Shouldn't Requirement (a)(iii) be moved to Standard 206 since it deals with provision of the data? In fact, there is a great deal of material in 205 that is related data provision. Shouldn't all of this be moved to 206? Perhaps additional clarification between 205 and 206 is all that is needed.
206(e) Only one data point out of potentially thousands of points could cause non-compliance as specified in (e). This implies that nothing less than 100% of the data, 100% of the time is sufficient. Is this the intent of the standard? Is a transducer failure in a remote substation as damaging to reliability of the interconnection as

the loss of an entire ICCP link between a responding entity and its reliability authority? Is a failure for one scan cycle as critical as that point not being available for days or weeks? It would appear that non-compliance associated with this standard needs revisiting.

There appears to be inconsistency between non-compliance in 205 and 206. If a reliability authority makes an unreasonable data request in 205 and doesn't get the requested data within the specified timeframe, then the reliability authority is only penalized at a level one. But if a responding entity loses one data point for one four-second data scan, that responding entity is blasted with a level four penalty. There does not appear to be equity here.

208(a)(1) Generator operators need to be added to the entities listed.

Requirement (a)(ii) is repeated again in Measure (b)(i).

The levels of non-compliance need to be reviewed to ensure that they accurately reflect how well the directives were followed. Timing of actions taken with regards to when the directives were issued should also be considered.

Alabama Electric Cooperative AEC — Negative

Transmission Dependent Utilities

The entire standard is to ambiguous and does little to clear up the OSL- OSLV confussion that has lingered for years.

Allegheny Energy Supply Company AESC — Negative

Electric Generators

Allegheny Power AP — Negative

Transmission Owners

*Tv should have a default value of 30 minutes. Variations should be permitted with reason.
*Adjoining Reliability Authorities should be allowed to review Tvs.
*Regional Councils should monitor Tvs.
*Financial sanctions may be less effective than desired when the structure of the Reliability Authority (RTO) allows for the penalty to be passed on to others.

Ameren Energy AME — Negative

Electricity Brokers, Aggregators, and Marketers

Ameren Services Company AMSE — Negative

Transmission Owners

American Public Power Association — Affirmative

Load Serving Entities (LSEs)

American Transmission Company LLC ATC — Negative

Transmission Owners

The standard is not precise enough in defining where it should be applied. More specifically, the standard asks Reliability Authorities to designate facilities to be subject to IROL's, as distinct from SOL's, presumably on the basis of potential

"Wide Area Impact," but the meaning of "Wide Area" remains an open question. For example, it remains undetermined whether the largest city or even some multi-state regions would meet the definition of "Wide Area."

The treatment of Tv is incomplete in a number of ways. For example, the compliance monitoring process requires a list of facilities and associated operating limits subject to IROL's but without mention of the associated Tv for each of that list's facilities (Section 201 (d) (3)). Conformance to the NERC Functional Model could be improved since the current version of the Functional Model makes the Reliability Authority responsible for determining IROL's but not specifically the time limits associated with those IROL's. Finally, the standard allows for some radical values of Tv. If Tv is set to zero, for instance, it creates the possibly unintended requirement to operate some facilities to an N-2 criterion.

Contrasting operator actions versus documentation, the standard is relatively overly focused on documentation. As a specific example of this, Section 204, which addresses "Actions," permits an IROL shorter than Tv yet still requires documentation of the event (Section 204 (e) (1)). The documentation required by this standard is so burdensome that it risks system operations could become distracted from its primary role of acting on IROL's.

The definition of "Operational Planning Analysis" refers to "expected system conditions." The use of the word "expected" leaves too much room for interpretation about which contingencies, if any, must be included in the planning analysis.

Before this standard can be implemented, the "Determine Facility Ratings, System Operating Limits and Transfer Capabilities" standard must be implemented. However, the effective date of this standard has been set without regard for the effective date of the "Determine Facility Ratings" standard.

This standard should be field tested before implementation, considering the magnitude of the standard's scope, resource requirements, and potentially adverse impact to reliability.

Aquila, Inc. Negative

Transmission Owners

This standard seems to lack industry consensus and needs further development before Aquila could vote yes.

Arizona Electric Power Cooperative AEPC Negative

Transmission Dependent Utilities

Arizona Public Service-Transmission APST Negative

Transmission Owners

Arkansas Electric Cooperative Corporation AECC Affirmative

Transmission Dependent Utilities

Avista Corp. AVA Negative

Transmission Owners

Avista Comments

1. The implementation date is too soon. The standard relies on the role of the Reliability Authority and another standard (Determine Facility Ratings, System Operating Limits and Transfer Capabilities) both of which are still being drafted. The

RA functions need to be clearly defined and approved before implementing this standard.

2. The standard does not address a time frame in which a response to a directive is required. In order for the standard to be affective there must be a time frame developed to monitor proper response.

3. The sanctions need to be set up based on % overload not MW overload. Under the proposed standard a 10 MW overload on a 10,000 MW path will have the same sanction as a 10 MW overload on a 100 MW path.

4. The standard puts the responsibility on the RA instead of the path operator. Under the functional model these may be separate entities. The transmission owner and/or path operator should be responsible for maintaining flows within Interconnection Reliability Operating Limits (IROL) not the RA. Combining too much responsibility under the RA will lead to reduced reliability not increased reliability. The transmission owner and/or path operator should not wait for a directive from the RA before taking action. The standard puts another layer between the operation of the path and the reliability of the system.

Avista Corp. Washington Water Power Division AVWP Negative

Electric Generators

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B.C. Hydro & Power Authority BCHA Affirmative

Load Serving Entities (LSEs)

Basin Electric Power Cooperative BEPC Negative

Transmission Owners

Bonneville Power Administration - Power Business BPAP Negative

Electric Generators

1) 201.a.2.i states that the Reliability Authority (RA) shall identify the maximum time that an Interconnected Reliability Operating Limit (IROL) can be exceeded without compliance sanctions being applied for each IROL. Presently WECC states the time limit as 20 minutes for stability and 30 minutes for thermal limitations. It should not the responsibility of each individual RA to set the time limit, but rather

the responsibility of the NERC Region (or sub region at the very least). There are paths on which energy flows between different RA's areas of responsibility. There is, under the proposed wording, the possibility that two different time limits be set, one by each RA? This could lead to much confusion.

2) Procedurally, it seems that for the number of changes that were made to the standard after the last round of comments, an additional round of comment would have been more appropriate than taking this dramatically changed draft to a final vote.

Bonneville Power Administration Transmission BPAT Negative

Transmission Owners

Comments on NERC OWL Standard 200.doc *29,696 bytes*

Comments of Bonneville Power Administration - Transmission Business Line - on NERC Standard 200 – Operate within Interconnected Reliability Operating Limits

1) The term “system operating limit” is used in the definition of the Interconnection Reliability Operating Limit (IROL) but it is not defined in this standard nor is there a reference that it is as defined in the proposed Standard 600, “Determine Facility Ratings, System operating Limits, and Transfer Capabilities”. In Standard 200 there should be a clear understanding that the IROL is a subset of a “System Operating Limit” as defined in the proposed Standard 600.

2) Definition of Cascading outages does not match existing definition that was laboriously reviewed within NERC (the last sentence of the old definition was not included here). The widespread component of cascading in the original definition is important – some local cascading could be acceptable and must be preserved.

3) There should be a Technical Reference, either attached to the Standard or as an appendix to the Standard, with much of the information that is in the Question and Answer document, including the IROL Violation Report form.

4) It is our understanding that the Reliability Authority can delegate the function of calculating IROLs. If that is true, it would be good to clarify that possibility.

5) We recommend a NERC maximum Tv of 30 minutes with the option for the NERC Region and/or the Reliability Authority to set a shorter Tv as appropriate.

6) In Section 204.f (Actions/Sanctions) there should be a clear definition of the megawatt value used to calculate the sanctions. Is the megawatt value the maximum value the IROL is exceeded, the megawatt value the IROL is exceeded at time Tv, or an average value of the IROL violation over the Tv period? We recommend that the MW violation be based on an average MW percentage of the violation of the IROL over the time period that exceeds Tv.

We would also like to see a time component added in calculating the sanctions. The time component would add motivation to alleviate a violation instead of letting a small violation continue for a long period of time. An example of a time component would the severity of the violation would double if the time of the reportable IROL violation exceeded Tv such that the IROL has been exceeded for 2Tv .

7) Section 201.d.2 states that the “Performance reset period shall be 12 months from the last violation”. I assume that this is per each IROL (or rated path), but there is no further information. Are the facilities/IROLs grouped into one for the reset period or is there a separate reset period for each facility/IROL?

8) Sections 205 and 206 both deal with “data”. Only in Section 205.b.3 is “status” mentioned. To perform a real time analysis requires both “data” and “status”. We recommend removing “status” from Section 205.b.3 with the understanding that “data” includes “status”.

9) The “Definitions” Section defines the “Occurrence Period (Performance-reset Period)” as “the time period in which performance is measured, evaluated, and then reset”. The “Performance-reset Period” for each of the requirements in this Standard is 12 months and the maximum “Number of Violations in Occurrence Period at a Given Level” is “4 or more”.

a. We recommend that the definition of “Occurrence Period” not be included in the definition of the “Performance-reset Period” but be defined on its own so that the Standard and the Compliance Sanction Table are understandable.
b. We recommend that the compliance processes be defined in a Compliance Standard instead of each separate standard.

10) In Section 202(b)(3), the standard indicates that the RA shall monitor “system operating parameters” which is an undefined term. It is unclear why the RA would need any information not included in the IROL to monitor the system. More explanation of what system operating parameters include is needed and how this information is different from the information in the IROL. It is recommended that “System Operating Parameters” be defined in the “Definition” section of the Standard and that it include something similar to “variables that impact the IROL”.

11) “Action Plan” should be defined in the “Definition” section of the Standard.

Boston Edison Company BECO Negative

Transmission Owners

NSTAR shares the general concern that the standard is not specific relative to the time in which the system should be placed back to a secure state. This leaves the requirement as an open ended one and we feel it should have a maximum duration established, preferably 30 minutes.

CAISO CISO Affirmative

Regional Transmission Organizations (RTOs), Independent System Operators (ISOs), and Regional Reliability Councils

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California Energy Commission Negative

Federal, State, and Provincial Regulatory or other Government Entities

REASONS FOR THE CALIFORNIA ENERGY COMMISSION VOTE AGAINST.doc *28,160 bytes*

Calpine Power Management LP Negative

Transmission Dependent Utilities

We concur with the issues raised by the Southwest Power Pool as to the readiness of the Standard to be voted on.

Carolina Power & Light Company CPL Negative

Transmission Owners

PGN Comments on OWL Standard.doc *26,624 bytes*

Carolina Power & Light Company CPL Negative

Load Serving Entities (LSEs)

PGN Comments on OWL Standard.doc *26,624 bytes*

Carolina Power & Light Company CPL Negative

Electric Generators

PGN Comments on OWL Standard.doc *26,624 bytes*

CenterPoint Energy Negative

Transmission Owners

Chelan County PUD CHPD Negative

Load Serving Entities (LSEs)

Cinergy Corporation CIN Negative

Transmission Owners

1-6-04
Cinergy response to NERC "Operate Within Interconnected Reliability Limits Standard".

Cinergy would like to thank the Standard Drafting Team for their efforts to date in drafting the "Operate Within Interconnected Reliability Limits" Standard. Cinergy supports the direction of this Standard however we must offer the following comments related to our vote against it at this time.

1. In light of the events affecting the Eastern Interconnection on August 14, 2003 resulting in the blackout of millions of customers in the United States and Canada, Cinergy feels that the standard may not adequately address recommendations yet to come from the Task Force investigating the event. Cinergy believes that the approval of this standard should wait until recommendations from the Task Force on preventing future blackouts are released.

2. The term IROL and its definition remain confusing and leave room for interpretation. Until the requirements for Standard 600 have been agreed upon by the industry, it is difficult to approve this Standard which remains incomplete until Standard 600 is approved. Standard 600 does not even refer to the term IROL.

3. Cinergy is concerned that retiring existing policies when this Standard goes into affect may allow certain requirements to "fall through the cracks". Absent clear designation of who this Standard would apply to prior to certification of the Reliability Functions leaves some questions regarding the authority of the control areas. For instance, retiring policy 5C2 suggests a System Operator for a Control Area no longer has the authority, or possibly the requirement to possess the authority, to take actions in the event of an emergency. Does the Standard prevent other operating entities such as transmission or generation operators from taking necessary action if needed to prevent damage to facilities due to communication problems with the Reliability Authority or other factors requiring immediate action?

4. Prior to implementation, NERC should not generically assign the responsibilities of the Standard to those currently providing the functions, it should require each Control Area to identify the entity responsible for performing the function of the RA for its Control Area and then require the RA to confirm that responsibility.

Thank you.

City of Glendale GLEN Negative

Transmission Dependent Utilities

City of Lakeland PLKT Negative

Transmission Owners

City of Lakeland PLKT Negative

Load Serving Entities (LSEs)

I support the development of this standard, but there are concerns that need to be addressed:

1. The Q&A document states the Operate Within IROL standard can't be implemented until after the Determine Facility Ratings System Operating Limits and Transfer Capabilities standard is implemented.

2. The understanding of the functional model needs to be improved. The RA described in the standard is not active today. The functional model needs to have final approval and be implemented.

3. Better definition of Bulk Electric System is needed.

4. Better definition of Wide Area Impact is needed.

City of Lakeland PLKT Negative

Electric Generators

1)Voting on Standards should not take place until Functional Model completely finshed and final version approved by BOT.
2)Should not approve until STD 600 has been completed and approved as this STD dependant on 600.
3)Action plans referenced in part 207 not sufficiently defined, ie; plan for what, every possible contingency ? subsets ?
4)STD does not address seams issues and how the RA interacts with other RA's when seams problems arise
5)Some defintions are vague and somewhat circular. Wide Area Impact seems to be same as IROL, lack of clarity on scope of area for cascading outages, ie; single control area or RA's area or beyond ? Possible confusion with Wide Area Impact . Bulk Electric System definiton ?
6)STD implies the RA has more authority and poser to act than what the Funtional Model describes

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City of Lakeland PLKT Negative

Electricity Brokers, Aggregators, and Marketers

1. The Functional Model needs to be completed and approved before Standards.

City of Tallahassee TAL Negative

Transmission Owners

Comments Operate Within IROL.doc *30,720 bytes*

City of Tallahassee TAL Negative

Load Serving Entities (LSEs)

City of Tallahassee TAL Negative

Electric Generators

1) IROLs will be defined by the unapproved standard "Determine Facility Ratings...". I would prefer to approve the supporting documents before we approve this document. (Coordinated Operations will be another one that may be needed before this one.) Although the Implementation Plan states Prerequisite Approvals, how can the effective date be the "first day of the month following the month that

the NERC Board of Trustees adopts the standard" if the supporting documents are not approved first. It does not specify what are ALL the supporting documents.

2) The definition of Tv in the standard does not match the intent explained in the Q&A document. By the Q&A document it includes “unacceptable” risk, shouldn’t that be in the definition?
“ The maximum amount of time that an IROL can be exceeded without the risk to the interconnection becoming unacceptable”?
IROL violations that persist for longer than Tv will result in a sanction.

3) If a Tv is set to zero due to the high risk, and that IROL is exceeded due to "acts of god" or circumstances beyond the entities control, the offending party is subject to sanctions, or having this event count against them, if their Special Protection Scheme fails.

4) 203.a.2 - How far out is the Real-time Assessment supposed to look? Only 30 minutes since it is run at least every 30 minutes, or up to the day ahead since a day ahead look is done at least every day. What is meant by "expected"? First contingency?

5) 204.a.1 - footnote- How can we allow 'no overt action' for an expected IROL violation. By 207.a.1 the RA "shall have an action plan to prevent..." If he has to have a plan, how can we allow "no overt action"?

6) 208.a.1 - The standard does not specify that another RA has to following the directives of an adjacent RA, such as SERC/FRCC border or interface issues.

7) Under the Sanctions - Fixed Dollars: In reference to the last line; "If those assumptions prove wrong in the future, yet they are made in good faith using good practices, entities should not be harshly penalized for the outcome." Why is there ANY penalty if a best guess was a little off?

City Utilities of Springfield SPRM Affirmative

Load Serving Entities (LSEs)

City Water Light & Power CWLP Negative

Electric Generators

There is no upper limit to Tv. I believe it should have an upper limit of 30 minutes.

Also, in the penalty matrix, the violations should not be based on actual MW, but be based on the percent of the facility rating. For example, being 20 MW over the rating of a 100 MW rated facility is a lot worse than being 20 MW over a 1000 MW rated facility.

Cleco Utility Group CLEC Negative

Transmission Owners

Cleco Utility Group CLEC Negative

Load Serving Entities (LSEs)

Con Edison Company of New York CEPD Negative

Transmission Owners

Con Edison Company of New York CEPD Negative

Load Serving Entities (LSEs)

The existing NERC Policy 2 limits the time an IROL shall be exceeded to 30 minutes. Permitting a Reliability Authority to establish a Tv in excess of 30 minutes for certain IROLs, as permitted by the proposed Standard 200, implies that not restricting the maximum value of Tv poses no threat to reliability. However, we know of no method for calculating the reliability risk of increasing Tv above 30 minutes. Moreover, if Reliability Authorities were permitted the option of expanding Tv beyond 30 minutes according to what they perceive as acceptable risk, the reliability of neighboring systems will be impacted by decisions they have no control over.

It should be stated in Standard 200 that more stringent criteria than specified in the Standard may be adopted by a Region or sub-region, even if not specifically identified in the Regional Differences section.

Con Edison Company of New York CEPD Negative

Electricity Brokers, Aggregators, and Marketers

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Conectiv Power Delivery Affirmative

Transmission Owners

Consolidated Edison Co. of New York NYCE Negative

Electric Generators

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Consumers Energy CETR Negative

Load Serving Entities (LSEs)

Tv should not be left without a default value that represents a generally recognized value used by much of the industry.

Tv should have a default value assigned of 30 minutes. If explicitly justified and coordinated with other RA's or entities whose areas may be affected by by the IROL, the Reliability Authority should then have the ability to override the default value.

Consumers Energy CETR — Negative

Transmission Dependent Utilities

Consumers Energy votes against this proposed standard because it fails to establish specific Interconnection Reliability Operating Limit measures and specific Tv values for those measures. Further it leaves the development of such measures to each Reliability Authority, thus potentially causing significant differences in compliance requirements between control areas without a workable mechanism to come to concensus on the appropriate measures and Tv values.

Consumers Energy is also concerned that the implementation provisions of this standard does not allow for adequate time for development and training of personnel before compliance is mandated.

Corn Belt Power CBPC — Affirmative

Transmission Owners

Dairyland Power Cooperative DPC — Negative

Transmission Owners

The definition of "Interconnection Reliability Operating Limit" implies that it is acceptable to operate over established limits if it would not cause cascading. Concern that this could result in a degradation of reliability.

Dairyland Power Cooperative DPC — Negative

Electric Generators

Delmarva Power & Light Company DEL — Affirmative

Load Serving Entities (LSEs)

Dominion Virginia Power VAP — Negative

Transmission Owners

DTE Energy Trading DTET — Abstain

Electricity Brokers, Aggregators, and Marketers

Duke Power DUKE — Negative

Transmission Owners

Duke Power Comments on Standard 200.doc *22,016 bytes*

Duke Power DUKE — Negative

Load Serving Entities (LSEs)

Duke Power supports the development of a well structured Operate Within Limits Standard and appreciates the work of the SAR and Standards drafting teams. While we recognize that significant progress in the development of this Standard has been made, please accept these comments associated with the initial balloting for this Standard:

Comment #1: This standard has “lost” the recognition of current Policy that recovery from an OSL violation should be capped at some maximum amount of time. Recommend that a maximum time for recovery be developed which will limit

the exposure of the Interconnection to the OSL risk while recognizing the various time duration assumptions used in the development of the associated equipment rating(s).

Comment #2: The definition of “wide area” is still being developed. Industry needs to reach consensus definition of this term prior to its being utilized in a Standard. Recommend that this definition be completed prior to being used in a Standard.

Comment #3: The “Effective Date” as defined by this Standard is inconsistent with the associated Implementation Plan. Further, to predicate the implementation of one Standard on another, yet undeveloped Standard, creates unreasonable uncertainty as to the intended implementation and applicability of this Standard.

Comment #4: The “Applicability” of this Standard to existing entities performing various system functions, as defined in the functional model, prior to the identification and certification of those entities creates unjust confusion and uncertainty as to responsibility and accountability. In this interim period, this creates more uncertainty as to who is responsible and moves the industry to a less defined state.

Comment #5: Is this language intended to preclude CAs from having direct ISN and directly sharing operational data? In the current state, this has become an acceptable approach to ISN data exchange.

Comment #6: This Standard appears to be much more prescriptive concerning the responsibility of the RA with respect to the current state of the Reliability Coordinators – specifically with respect to the issues concerning “delegation” of responsibilities and the incumbent utility’s statutory obligations to serve.

Duke Power DUKE Negative

Electric Generators

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Comment #5: Is this language intended to preclude CAs from having direct ISN and directly sharing operational data? In the current state, this has become an

acceptable approach to ISN data exchange.

Comment #6: This Standard appears to be much more prescriptive concerning the responsibility of the RA with respect to the current state of the Reliability Coordinators – specifically with respect to the issues concerning “delegation” of responsibilities and the incumbent utility’s statutory obligations to serve.

East Kentucky Power Cooperative EKPC Negative

Transmission Owners

Although the importance of this standard and the excellent work up to this point is recognized, until the relationships and responsibilities of existing Control Areas, Reliability Cooordinators, etc. as they will be defined for entities in the new Functional Model are understood, who will need to comply and how they will comply are unclear. Additionally, this standard relies on Facility Ratings and Operating Limits that are yet undefined in another new standard. Approval of this IROL standard at this time is premature. The others need to come first.

East Kentucky Power Cooperative EKPC Negative

Electric Generators

ECAR Abstain

Regional Transmission Organizations (RTOs), Independent System Operators (ISOs), and Regional Reliability Councils

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Electricity Consumers Resource Council Negative

Large Electricity End Users

ELCON votes “No” on the “Operate Within IROL Limits.” Our primary concerns are listed below. In addition, we recognize that many detailed comments have been filed that must be reconciled before enacting the Standard.

Primary Concerns:

1. NERC’s current Operating Policy 2 limits the time an IROL (TV) can be exceeded without compliance sanctions to a maximum of 30 minutes. The proposed standard implies that TV‘s may be greater than 30 minutes. This change must be more fully explained.
2. We are concerned that the definition or criteria regarding the differentiation between “Local” and “Wide Area Impact” is unclear. The proposed standard does not appear to provide adequate responses if the electric area to be included in the limit is larger than the portion of the transmission system under the authority of a single Reliability Authority (RA). The standard should clearly explain how an RA can order all TO’s, BA’s, IA’s and other RA’s to take necessary actions if they are not within the controlling RA’s reliability area.
3. The “Questions and Answers About the Operate Within IROLs Standard” states that the Operate Within Limits Standard cannot be implemented until AFTER the Determine Facility Ratings, System Operating limits and Transfer Capabilities Standard has been implemented. Yet, the Effective Date of this Standard is the first day of the month following NERC Board approval. This conflict must be resolved.
4. Section 201 does not require consistency between RA’s regarding the monitoring of flow gates. A lack of consistency will lead to reliability problems and must be resolved.
5. There is no requirement for commercially seamless Action Plans between Regions or RTOs. The Standard should, at least, recognize that consistent Action Plans may have either reliability or commercial implications.

Empire District Electric Co. EDE Negative

Transmission Owners

Entergy EES Negative

Transmission Owners

Standard OWL NEGATIVE VOTE 12-23-03.doc *26,624 bytes*

Entergy Services ENTE Negative

Load Serving Entities (LSEs)

Section 204(a) needs to be worded so that it is abundantly clear that a Reliability Authority must always act prudently to maintain the reliability of the system given the actual situation that has developed. In certain situations, prudent action may not include taking action to prevent exceeding a predetermined IROL or even mitigating the magnitude or duration of a violation. The definition of IROL is that it is a limit that, if exceeded, "could" lead to instability..... IROLs are no more than measure points to be used in monitoring the system. Any actions taken or directed by a reliability authority must be prudent based on the actual situation and system conditions and with the goal of maintaining reliability not only for the immediate time period but for the entire operational planning time period as well.

Entergy Services ENTE Negative

Electricity Brokers, Aggregators, and Marketers

ERCOT Affirmative

Regional Transmission Organizations (RTOs), Independent System Operators (ISOs), and Regional Reliability Councils

Exelon Energy Delivery - PECO & ComEd Negative

Transmission Owners

Exelon Energy Delivery EED - PECO & ComEd Negative

Load Serving Entities (LSEs)

1. Based on information passed on in the OWL web cast, there is confusion on what entity assumes responsibility as Reliability Authority (based on the functional model). The industry should not pursue this Standard until all entities clearly understand accountability and responsibility associated with this Standard.
2. Exelon believes that a maximim Tv should be established, and a requirement should be put in place for the coordination of Tv for tie-lines and for limiting elements in different RAs that are results of a common contingency.
3. Exelon believes that the definition of "Wide Area Impact" is incorrect. The second sentence of the defintion states, "The geographic size of the area affected by such an event is always larger than a single Reliability Authority's area". This implies that a blackout confined to a major city monitored by a single transmission operator is not a violation of this Standard. Such an event not being a violation of this standard could lead to the conclusion that this Standard is not accomplishing it's objective. Exelon suggests that the second sentence be removed.

Exelon Generation Company LLC EXGN Negative

Electricity Brokers, Aggregators, and Marketers

Exelon is voting NO for the following reasons
1. Based on information passed on in the OWL web cast, there is confusion on what entity assumes responsibility as Reliability Authority (based on the Functional Model). The industry should not pursue this Standard until all entities clearly understand accountability and responsibility associated with this Standard.

2. Exelon believes that a maximum Tv should be established, and further a requirement should be put in place for the coordination of Tv for tie-lines and for limiting elements in different RAs that are results of a common contingency .

3. Exelon believes that the definition of “Wide Area Impact” is incorrect. The second sentence of the definition states, “The geographic size of the area affected by such an event is always larger than the local area monitored by a single transmission operator and may also be larger than a single Reliability Authority’s area”. This implies that a blackout confined to a major city monitored by a single transmission operator is not a violation of this standard. Such an event not being a violation of this standard could lead to the conclusion that this standard is not accomplishing its objective. Exelon suggests the second sentence be removed.

FirstEnergy Corp Negative

Transmission Owners

FirstEnergy does not agree that there should be an open ended position on the Tv. The development of Tv, as stated in the standard, is open to determination by the Reliability Authority. There needs to be a maximum time limit established, such as the current 30 minute as stated in NERC policy

A fundamental problem is that it is difficult to determine what facility could be a potential IROL before the fact. The proposed document gives little guidance. In section 201, IROL Identification, the requirements simply state the Reliability Authority shall identify what facilities are subject to IROL, with no real guidance on how to do it. This leaves it up to the Reliability Authority to document how they will determine their IROLs, and then if anything goes wrong they will be second guessed that they did not do it right. If the Reliability Authority takes the extreme position and 'over' specify facilities as potential IROLs, they will cover themselves for any second guessing, but operate the system in a potentially overly conservative manner.

It is difficult to establish what areas, or electrical boundaries, are to be protected. The standard does not give clear definition on how local or wide area impacts are determined.

FirstEnergy does not support documenting all limit violations. We need to be able to documents only those violations that are in excess of Tv. Documenting all limit violations would be an effort with no real reward or substantive information.

FirstEnergy Solutions FESC Negative

Load Serving Entities (LSEs)

FES does not agree that the Tv should be open ended to determination by the Reliability Authority.
We do not support documenting all limit violations. Only those violations that are in excess of Tv are needed.

FirstEnergy Solutions FESC Negative

Electricity Brokers, Aggregators, and Marketers

My main concern is that standards should not left up to determiniation by the individual RAs. Since the individual RAs have a different risk tolerance, the standards may vary over the different RAs and may impact the market.
A standard should be a strandard for all RAs. Documenting every limit violation may prove to be burdensome with little imact on reliability.

Florida Municipal Power Agency FMPA Negative

Load Serving Entities (LSEs)

Florida Municipal Power Agency FMPA Negative
Transmission Dependent Utilities

Florida Power & Light FPL Negative
Transmission Owners

Florida Power & Light FPL Negative
Load Serving Entities (LSEs)

Florida Power & Light FPL Negative
Electric Generators

The FRCC supports the development of a standard that requires operating within Interconnected Reliability Operating Limits. However, we are voting no in this ballot, as we believe that there is still work to do in refining this particular standard. The following questions and comments are provided to help the drafting team understand our concerns.

o The understanding of the Reliability Authority is very critical in interpreting this standard. It appears to us that this standard is written with the RA being the entity today that is the Reliability Coordinator. This confusion was discussed on the Web cast conference call, and it was stated by the Chair of the drafting team, that the RA is not the RC of today. The RA in this standard needs “wide area oversight” to perform the requirements of this standard. We have concern, especially with requirement 208, about how a RA (who is not a RC of today) can issue directives to TO’s, BA’s, IA’s and other RA’s if they are not within their reliability area. If the functional model allows an individual CA/TO of today to be a RA tomorrow, it looks like they are giving directives to themselves. So it looks like the RA as defined in version 2 of the functional model does not fit the needs of this standard. That may be more of a problem with interpretation of the functional model than this standard, but until that confusion is cleared up, we have trouble approving this draft.

o The implementation plan states (pg 8) that this standard would not be implemented until after the Determine Facility Ratings standard has been implemented. If this is true, it does not make sense to approve this, especially with outstanding issues, until after the Determine Facility Ratings standard is completed and approved. Also, on the Web cast, when we asked about the ability of the RA to direct other RA’s (it is not stated in 208), we were told that the Coordinate Operations Standard would take care of that. Does that mean that this standard is also dependent on the Coordinate Operations standard being in place first?

o We were unsure if an IROL event would be pre-contingency or post-contingency. This question was raised on the web cast, and it sounded like the answer was that the IROL events were all “real-time”. We wondered if Tv should be 0 for a real-time event and something greater than 0 for a pre-contingency event. The definition of Tv states that it is the maximum time the system operator has to return to a state that is at or below the limit before being subjected to compliance sanctions. We believe this is an inadequate definition. Tv should not be based on when compliance sanctions begin, but rather on the time the RA is willing to risk the system. This also depends whether it is pre or post contingency. It is clear that more work needs to be done in clarifying this definition.

o The definition of Bulk Electric System is circular and does not help anyone understand what is the Bulk Electric System. In fact, the interim blackout report has a definition that is more specific, but we are not even sure if that is the definition that has been used in other NERC policies and standards.

o The definition of Wide Area Impact is really the same as the definition of IROL.

This definition does not help anyone understand what a wide area really is either.

We have other minor comments, but these are our primary concerns. We would recommend that this draft standard be returned to the drafting process for re-posting and comment. Once all the comments and concerns have been addressed, it should be re-balloted.

FRCC Negative

Regional Transmission Organizations (RTOs), Independent System Operators (ISOs), and Regional Reliability Councils

The FRCC supports the development of a standard that requires operating within Interconnected Reliability Operating Limits. However, we are voting no in this ballot, as we believe that there is still work to do in refining this particular standard. The following questions and comments are provided to help the drafting team understand our concerns.

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We have other minor comments, but these are our primary concerns. We would recommend that this draft standard be returned to the drafting process for re-posting and comment. Once all the comments and concerns have been addressed, it should be re-balloted.

Gainesville Regional Utilities GVL Negative

Electric Generators

I am voting against for a couple of reasons. 1. It iis not clear as to which individual entities are the relaibility authority. Is it each regional Security Coordinator or a Control Area within a security region. This needs clarification. The second point as to when Contingency analysis needs to be run. The requirement says a requirement of 30 minutes. I believe this is should be executed as needed without the requirement of 30 minutes. I also believe that IROL Tv should be defined(30 Minutes). I also believe that the sanction matrix should be clarified. Is it $ per mw over IROL Limit, or $ per Mw for facility. I agree with a % over IROL that exceeds 30 minutes may have sanctions levied. But I must reitterate clarify the Sanction matrix.

Thanks

MB

Gainsville Regional Utilities GVL Negative

Load Serving Entities (LSEs)

FRCC Staff and ORS Comments on
Operate Within Interconnected Reliability Operating Limits

Summary of Standard from Q & A Document
This standard requires adherence to the subset of system operating limits identified to prevent instability, uncontrolled separation or cascading outages that adversely impact the reliability of the bulk transmission system. These limits are called interconnection reliability operating limits and are under the authority of the entity performing the reliability authority function. (Note that there are many other system operating limits that are used by system operators working for entities performing the Reliability Authority function and for entities performing the Transmission Operator function. This standard only addresses Interconnection Reliability Operating Limits.)

This standard is subdivided into eight requirements. Each of the requirements addresses some aspect of monitoring or controlling the transmission system to operate within IROLs. Some of these requirements address underlying responsibilities that must be accomplished as a prerequisite to monitoring and controlling the transmission system relative to IROLs.

Comments on Posted Standard
FRCC Staff and ORS reviewed the standard and recommends voting NO during the ballot period. The following information can be used by the FRCC ballot body in development of comments to be included with member's NO vote.

General Comments
· The question of which entities will be a RA is very critical to considering this standard. If for example, FPL, PEF, TEC or others are all RA's the definition of local area and widespread all have a different view. The standard appears to be written with the RA as a similar entity as the existing Reliability Coordinator. Basically an overseer monitoring a designated area for reliability. The RA as defined in the Functional Model Version 2 does not seem to fit the standard.
· The information provided in the Q&A document and the Implementation Plan indicates that the Operate within Limits will not be implemented until the Determine Facilities Ratings Standard (STD 600) has been implemented. This leads to the following questions:
o Why balloting so early? Shouldn't STD 600 be adopted prior to or in conjunction with the IROL standard?
o How do the entities know how to establish IROLs with out determining ratings and limits? In addition, there is no common process for developing an IROL and corresponding Tv. It appears from a review of STD 600 that this has not been

covered in either standard.
· It is unclear if an IROL event is initiated pre-contingency or post-contingency.
· The IROL Tv continues to be an area of confusion. Tv is the maximum amount of time the system operator has to return to a state that is at or below the limit before being subjected to compliance sanctions. This does not help anyone figure out how to determine Tv. It should be based on how much time before the risk is too great.
o How is the IROL Tv calculated? If it is pre-contingency, it is really how long the RA is willing to take the risk of the contingency.
o Does the calculation of Tv depend on the tool used to determine the IROL?
o Would Tv be 0 for a real-time event and Tv be something greater fro a pre-contingency event?
o Should Tv have a maximum, for example 30 minutes?

Definitions
· Cascading Outages: The uncontrolled successive loss of system elements triggered by an incident at any location. There are more words in the definition provided in the Q&A documents. Is this definition good enough? Does it need to impact more than one system?
· Interconnection Reliability Operating Limit: A system operating limit which, if exceeded, could lead to instability, uncontrolled separation, or cascading outages that adversely impact the reliability of the bulk transmission system. Is the definition for cascading outages provided above good enough to determine an IROL?
· Tv: The maximum time that an Interconnection Reliability Operating Limit can be exceeded without compliance sanctions being applied. Shouldn't the time be based upon the time before the system is in jeopardy rather than when a sanction is applied for non-compliance? This definition would not help the RA determine what Tv should be.
· Wide Area Impact: The impact of an event that, if left untended, could lead to voltage instability, cascading outages or uncontrolled separation that jeopardizes the reliability of an interconnection. (This is really the same as the definition for the IROL. Are they really trying to define "wide area"? This does not seem to be correct. What does it add?) The geographic size of the area affected by such an event is always larger than the local area monitored by a single transmission operator and may also be larger than a single Reliability Authority's area.

Standard Requirements
· 200 As previously mentioned, Applicability continues to be an issue. In addition, the inclusion of the Functional Model in the standard implies that the standards will need to be updated every time the functional model changes. This comment also applies to the Implementation Plan.
· 201 - 208
o Compliance Monitoring Process – There are some inconsistencies in this area. It is indicated that the self-certification is submitted to the Compliance Monitor annually and the Performance-reset period is 12 months from the last violation. Do these match? What does it really mean? Do violations "rack-up" for 12 months? What if there is at least one violation each month? In addition to the time constraints, there should be evidence that the list of facilities subject to IROLS and the list of IROLS are supposed were updated. Does this mean keeping revisions for a certain time period?
o Sanctions – If the performance reset period is 12 months, then the financial sanctions could be minimal. Was that the intent? The identification of IROLS is critical to reliability.
· 204
o Requirements – Who is responsible for implementing an IROL mitigation plan? Transmission Owners? RA? Does the RA develop the plan or does the Transmission Owner?
· 207
o Requirements – The Reliability Authority shall have an action plan that identifies actions it shall take or actions it shall direct others to take, to prevent or mitigate instances of exceeding its Interconnection Reliability Operating Limits. From this it

looks like the RA will work with the owner to develop the action plans, but from the non-compliance levels an action plan could be developed without input. What good is this if the RA can't perform the mitigation? Seems very broad and burdensome to the RA. How detailed do the plans have to be? This could be very work intensive if detailed plans have to be documented for every single contingency. Is it alright if the action plan is to work with the facility owner to develop and/or implement mitigating plans? 204 already required that actions be taken. Why is there a need to document every possible action to take? Seems like 204 is the real key to protect reliability, not to keep piles of what it scenarios.
· 208
o Requirements - The standard does not address seams issues. It does not allow the RA to give direction to an entity outside the designated RA area. This is very important regardless if the RA is an entity such as TEC or if the RA is more of the Security (Reliability) Coordinator entity.
o Levels of Non-Compliance - Level four: The responsible entity did not follow the Reliability Authority's directives. If an entity does not follow the RA directive, will the RA have the ability to take action/implement the mitigation plan? If not, other than a financial penalty, it doesn't look like there is any way to make entities comply and reliability can be jeopardized.

Georgia Power Company Negative

Load Serving Entities (LSEs)

Southern Company-recommendation on the OWL standard ballot_rev1.doc *40,448 bytes*

Great River Energy GRE Negative

Transmission Owners

I have concerns about having an undefined upper limit on Tv. I would suggest thirty minutes if anything greater than thirty minutes being adopted as an exception to the standard needing approval by the appropriate committee. I also need additional clarification on who is the Reliability Authority. Is this the current Reliability Coordinator or is this still a Control Area function?

Gulf Power Company Negative

Load Serving Entities (LSEs)

Gulf-recommendation-OWL standard ballot_rev11.doc *40,448 bytes*

see attached file.

Hydro One Networks Inc Negative

Load Serving Entities (LSEs)

STD200 Position.doc *26,112 bytes*

Hydro One Networks Inc. Negative

Transmission Owners

We are very much concerned that the a diluted version of the existing standard is posted for approval post August 14 outage.

Core Reliabilility Standards such as this one should be extremely stringent and prescribed for all entities. Entities such as RC or CA should not have inconsistent practices to determine their own Tv. As a minumum maximum value of Tv should be prescribed.

Hydro-Quebec HQT Negative

Transmission Owners

The proposed Standard implies that Tv's may be greater than 30 minutes and may represent an acceptable risk to the North American bulk power system. There is no method or criteria established for determining acceptable risk or impact on reliability identified in the Standard or the associated Q&A. Therefore, it is difficult to support the statement that a response time greater than 30 minutes is acceptable.

Standard 200 should clearly reflect requirements and measures that require all Reliability Authorities to initiate immediate corrective actions as soon as an Interconnection Reliability Operating Limit (IROL) is exceeded or the system is in an unanalyzed state.

The Standard does not include clear definitions or criteria on how "local" and "Wide Area Impact" are determined. Therefore, it is difficult to assess what electrical boundaries an IROL is meant to protect. This definition of Wide Area Impact points out that the electrical area to be included in the limit may be larger than the portion of the transmission system under the authority of a single Reliability Authority (RA). This indicates the need for studies and associated limits that transcend the boundaries of a single RA's purview, yet there is no formal statement identifying this need in standard, 200, 600 or the Co-ordinate Operations Standard (currently under development).

Standard 200 should clearly reflect the fact that IROL's can be dynamic in nature. While it may be possible that every possible configuration can be identified in advance to deal with this dynamics, the reality is that this list would be extremely large and difficult to maintain. To improve on the situation, this section should require that the RA operators have a base set of limits that include N-1 configurations, along with identifying the following:

• The boundary conditions for which the published limits are applicable;
• The critical contingency that drive the applicable limit; and
• An understanding of what the associated limit is designed to protect the system against (i.e. transient stability, voltage decline, etc.)

Idaho Power Company IPCO Negative

Transmission Owners

Standard unduly restricts unacceptable operation to cascading outages.

International Transmission Company Affirmative

Transmission Owners

ISO New England Inc ISNE Negative

Regional Transmission Organizations (RTOs), Independent System Operators (ISOs), and Regional Reliability Councils

NERC Standard 200 - ISO Comments final.doc *92,672 bytes*

JEA JEA Negative

Transmission Owners

I agree with the comments developed collaboratively within the Florida region and supplied by Ms. Campbell (FRCC) with her ballot.

JEA JEA Negative

Load Serving Entities (LSEs)

JEA supports the concepts of this standard, but is voting no because JEA believes the proposed standard in its present form needs more work clarification prior to implementation by the industry.

JEA JEA Negative

Electric Generators

JEA supports the development of this standard but is voting no because JEA believes there is still more work needed to refine this standard before its implementation by the industry.

Kansas City Power & Light KCPL Negative

Transmission Owners

1) The standard must state the maximum time allowed for Tv
2) The per MW basis for violations is inappropriate, a percentage basis is mor realistic.
3) The levels of compliance sections in these standards should be revised to use all the levels to take into account severeity and reasonableness.
202.e Question if compliance differiates between telemetered and not telemetered but should
203.e Is missing one assessment as bad as missing assessments for a period of time?
204.e Is 30 seconds too short of a time for a reset durartion for Tv?
205.e Requirements are to open ended. Establish a minimum and let RA justify additional.
206.e Is missing one data point as severe as an entire ICCP link being down?

Kissimmee Utility Authority Negative

Load Serving Entities (LSEs)

FRCC comment on OWL ballot.doc *24,064 bytes*

As a member of the FRCC Operating Committee I have attached a file that while composed by the FRCC OC Group is an excellent representation of Kissimmee Utility Authority's views on this standard. Please read the file below for our comments.

LG&E Energy Transmission Services LGEE Negative

Transmission Owners

We do not believe the concept of a Reliability Authority has been sufficiently defined and needs clearification before we know what we are voting on.
We are concerned about a lack of clarity on exactly who the "Reliability Authority" is that would perform this function, especially in light of RTO roles and the proposed NERC functional model definitions.

LIPA LIPA Negative

Transmission Owners

Please refer to the comments of the Northeast Power Coordinating Council (NPCC) and the New york State Reliability Council, LLC. LIPA is in full agreement with the NPCC and NYSRC comments.

Louisville Gas & Electric LGE Negative

Load Serving Entities (LSEs)

Further detail is required in this SAR to define who is the "Reliability Authority" relative to ISOs/RTOs and the proposed NERC functional model of the different entities functioning in the industry. Otherwise a good standard, but who bears the cost of implementation and execution to achieve the improvement in reliability?

Louisville Gas & Electric LGE Negative

Electric Generators

Discussion has generated concern in regards to a lack of clarity on exactly who the "Reliability Authority" will be that performs this function, especially in light of ISO/RTO roles and the proposed NERC functional model definitions.

Louisville Gas & Electric LGE Negative

Electricity Brokers, Aggregators, and Marketers

Concerned about a lack of clarity on exactly who the "Reliability Authority" is that would perform this function, especially in light of RTO roles and the proposed NERC functional model definitions.

Lower Colorado River Authority LCRA Affirmative

Transmission Owners

MAAC Affirmative

Regional Transmission Organizations (RTOs), Independent System Operators (ISOs), and Regional Reliability Councils

I agree with commenters who suggest that there should be a 30 minute maximum limit to Tv, the "at risk" interval, and with the obligation that action should be initiated as soon as possible after recognition that a limit has been exceeded. I don't think that these are reasons enough to vote no, but would support them as additions to the standard.

MAIN Negative

Regional Transmission Organizations (RTOs), Independent System Operators (ISOs), and Regional Reliability Councils

MAIN Votes “NO” on proposed standard Operate Within Interconnected Reliability Operating Limits

Comments supporting this vote are as follows:

Time Values

• A maximum Tv should be established, and further a requirement should be put in place for the coordination of Tv for tie-lines and for limiting elements in different RAs that are results of a common contingency. This is the time that the Reliability Authority has to bring the violation back within limits. The current time maximum value for SOL's is 30 minutes. The proposed standard for this new subset of SOL's that effect interconnections doesn't have a cap and should if this standard will have any teeth, plus the standard should exemplify to the public that the industry is concerned about reliability Retaining 30 minutes as the cap is reasonable.

• The treatment of Tv is incomplete in a number of ways. For example, the compliance monitoring process requires a list of facilities and associated operating limits subject to IROL's but without mention of the associated Tv for each of that list's facilities (Section 201 (d) (3)). Conformance to the NERC Functional Model could be improved since the current version of the Functional Model makes the Reliability Authority responsible for determining IROL's but not specifically the time limits associated with those IROL's. Finally, the standard allows for some radical values of Tv. If Tv is set to zero, for instance, it creates the possibly unintended requirement to operate some facilities to an N-2 criterion.

• Having identified the IROLs in advance there needs to be allowance for reacting to a system circumstance that has similarity to what was predefined but has some

operationally significant differences in real time. e.g. there could be instances where an operator is directed to follow a predefined solution to an operating limit that may be invalid due to different circumstances that exist on the transmission system. While we are not trying to suggest that the process be burdened with debates, we believe that there should be a provision for discussions of conditions and effective actions, where time allows.

• Once the violation comes back within limits the standard states the event is over within 30 seconds. This is too soon,- it should be a longer period, perhaps 10 minutes.

• There is no specific language stating operators should begin to take action immediately to rectify the limit violation.
Language

• The penalty matrix should be based upon the % of line capacity violation versus the megawatt excess.

Testing Requirements

• There is substantial agreement with one of the WECC concerns about the application of the standard without first testing the provisions of the standard. The concept of a technical study to determine a fix when a limit is exceeded is good. However, it may be impractical to run such a study representing the system conditions in effect at the time of each operating limit violation to assess the consequences to determine if it is a reportable violation. The operator should be concentrating on fixing the problem.

• This standard has not been field-tested. Experience has demonstrated that much can be learned from field tests to verify that the standard requirements are measurable and enforceable. Results from analysis of field tests should be used to refine/verify the standard before it is implemented and enforced.

• This standard should be field tested before implementation, considering the magnitude of the standard's scope, resource requirements, and potentially adverse impact to reliability

RA and RC Authority

• The standard as drafted appears to place a sole responsibility with the Reliability Authority for determining which "facilities," Interconnection Reliability Operating Limits, and Tv are appropriate. It was stated on the informational call held by NERC that the RA is assumed to be the local system operator not the Reliability Coordinator. At least some members are of the opinion that the RA should work jointly, and in cooperation, with the Reliability Coordinator, Control Area Operator, Transmission Owner, Transmission Operator and Transmission Provider to accomplish the identification called for in section 201. This is a reasonable approach that will ensure complete identification of the facilities and limits, and further ensure a common understanding of any directives from the RA. The measurements could remain as stated.

• This standard appropriately does not just use the limits described in "(Draft) Standard 600 - Determine Facility Ratings, System Operating Limits and Transfer Capabilities" since the IROLs are to address circumstances that lead to instability, uncontrolled separation or cascading outages that adversely impact the reliability of the bulk transmission system. This distinction should be preserved and made more clear.

• Based on information passed on in the OWL web cast, there is confusion on what

entity assumes responsibility as Reliability Authority (based on the Functional Model). The industry should not pursue this Standard until all entities clearly understand accountability and responsibility associated with this Standard.

Definitions

• We believe that the definition of "Wide Area Impact" is incorrect. The second sentence of the definition states, "The geographic size of the area affected by such an event is always larger than the local area monitored by a single transmission operator and may also be larger than a single Reliability Authority's area". This implies that a blackout confined to a major city monitored by a single transmission operator is not a violation of this standard. Such an event not being a violation of this standard could lead to the conclusion that this standard is not accomplishing its objective. We suggest the second sentence be removed.

• The definition of "Operational Planning Analysis" refers to "expected system conditions." The use of the word "expected" leaves too much room for interpretation about which contingencies, if any, must be included in the planning analysis.

• The standard is not precise enough in defining where it should be applied. More specifically, the standard asks Reliability Authorities to designate facilities to be subject to IROL's, as distinct from SOL's, presumably on the basis of potential "Wide Area Impact," but the meaning of "Wide Area" remains an open question. For example, it remains undetermined whether the largest city or even some multi-state regions would meet the definition of "Wide Area."

General Comments

• Who will be the Reliability Authority and the Reliability Coordinator in the new NERC functional model will drive this standard to a revision draft.

• On the surface this standard seems like this is a "no-brainer" except that put into writing it is now too vague and leaves too much room for interpretation.

• Contrasting operator actions versus documentation, the standard is relatively overly focused on documentation. As a specific example of this, Section 204, which addresses "Actions," permits an IROL shorter than Tv yet still requires documentation of the event (Section 204 (e) (1)). The documentation required by this standard is so burdensome that it risks system operations could become distracted from its primary role of acting on IROL's.

• Before this standard can be implemented, the "Determine Facility Ratings, System Operating Limits and Transfer Capabilities" standard must be implemented. However, the effective date of this standard has been set without regard for the effective date of the "Determine Facility Ratings" standard.

Manitoba Hydro Negative

Transmission Owners

MH-TO-Comment on OWL standard.doc *27,136 bytes*

Manitoba Hydro Electric Board MHEB Negative

Electricity Brokers, Aggregators, and Marketers

Manitoba Hydro is voting against approval of Standard 200 – Operate within Limits for the following reasons:
• There is a fundamental disconnect between standard 600 regarding the development of limits (such as System operating Limits) and the limits (IROL's) required to implement this standard. Until this disconnect is resolved or this standard is revised to deal explicitly with the development of IROL's, it is not appropriate for standard 200 to be in place. Standard 600 specifies that SOLs are to be developed as first contingency limits that ensure that all underlying limits (such as voltage, flow or stability) are not violated. IROLs are defined as SOLs which if exceeded could lead to instability, uncontrolled separation or cascading outages that adversely impact the reliability of the bulk electric system. Based on standard 600, violation of most SOLs will not lead to instability, uncontrolled separation or cascading outages. For most regions only a small subset of SOLs are likely to be IROLs. Many tightly interconnected regions will not have IROLs at all for first contingency The only time that most SOLs could conceivably be classified as IROLs would be for deliberate disregard of the limits, multiple simultaneous contingencies or a system condition which is not consistent with the study assumptions used to define the limits (as might happen if other system operating limit violations are ignored). Therefore it is unlikely that monitoring only IROLs will be an effective way to prevent instability, uncontrolled separation, or cascading outages of the bulk electric system.
• NERC need to make a clear statement as to which entities will be responsible for ensuring operation within all of the System Operating Limits, since violations of these limits can lead to equipment damage and increase the risk of more violations and even IROL violations.
• We find it very difficult to envision the sort of limit that might be an IROL given the differences between this standard and standard 600. We challenge the standard development team to identify the IROLs that were violated in the August 14, 2003 disturbance. Since this standard requires the IROLs to be identified before, not after, the fact we don't believe that any such limits could have been defined for the system that collapsed, except in the final few minutes.
• Standard 200 requires criteria to be defined for the determination of Tv as a reporting benchmark – inviting misuse of the quantity. As defined in the Standard definition section, Tv does not appear to relate to the risk in the system, the responsiveness of the operators, the complexity of restoration procedures except in a vague sense that Tv is likely too long to wait before a return below the limit. This simplistic definition is very different than the one provided in page 9 of the question and answers document issued with the Standard which states "Tv is based on system risk." Therefore this definition should be revised to reflect that Tv should be based on the potential risk to the system of not taking corrective action in a time frame less than defined by Tv. This wording should also be included in section 201a.2.i of the Standard. This definition would be similar to the rationale for the 30 minute limit defined for OSL.
• Depending on the final definition of an IROL (in accordance with standard 600, or to avoid cascading, instability and uncontrolled separation), it may be essential to consider the extent of the violation (i.e., was the limit exceeded by 1% or 200 %?). If the IROL definition remains unchanged then it is very likely that even minimal violations are serious and, as well, that Tv may have to be very small.
• Standard 200 must be revised with a clearer statement that action is required in a timely manner. This requirement should be included in standard 204 a.1.
• It is not clear what is the legal standing of the implementation plan; should not this plan be part of the standard itself, so as to be documented, fixed and enforceable?
• The need for the development of mitigation / corrective actions to be developed, identified and documented for each system condition and any possible violation is very important and this standard does not provide sufficient emphasis on this issue. The standard dealing with this requirement is 207, but we believe it should be better emphasized by placing it immediately after "Analysis and Assessments".
• The individual items in Standards 200 should be presented by order of importance. Therefore the items should be renumbered in the following way:
-Standard 207 should become 204 as per bullet immediately above this one.
-Standard 204 "Actions" should be renumbered as 205. -Standard 208 which is linked with "Actions", but from the perspective of acting on the directives of the RA, should become 206.

-Standard 205 should be renumbered as 207.
-Standard 206 should be renumbered to 208.
• The need for all system conditions to be studied as they occur should be emphasized. Statement 201 b.3 should be expanded to state that the limits and the mitigation steps must BOTH be reviewed and revised, if required, to reflect all changes in current conditions. This need could also be identified in 203 b.1.ii (i.e., an assessment must be followed by revision of limits and guides if conditions warrant)
• The requirement to perform Operational Planning Analysis or the Real-time Assessment in standard 203 a should be more clearly defined. A methodology including any restrictions on or recommendations for how to perform these activities should be included in this standard.
• Standard 208 presumes legal agreements have been put in place to allow the reliability authority to demand actions. We have identified a risk that the presumption of the superiority of the Reliability Authority could have significant safety implications if knowledge of local conditions requires contrary actions to protect equipment or personnel. This risk should be dealt with in these legal documents.
• There are a confusing number of dates associated with the standard - these are the “Effective Date”, the “Implementation Date” and the “Compliance Date” – only one of which is defined in the standard (“Effective Date”). These should be better explained and clarified in the preamble of the standard.

Manitoba Hydro MHEB Negative

Load Serving Entities (LSEs)

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• NERC need to make a clear statement as to which entities will be responsible for ensuring operation within all of the System Operating Limits, since violations of these limits can lead to equipment damage and increase the risk of more violations and even IROL violations.
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Mid-Continent Area Power Pool MAPP Negative

Regional Transmission Organizations (RTOs), Independent System Operators (ISOs), and Regional Reliability Councils

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MidAmerican Energy Company MEC Affirmative

Load Serving Entities (LSEs)

Midwest Independent Transmission System Operator, Inc. Negative

Regional Transmission Organizations (RTOs), Independent System Operators

(ISOs), and Regional Reliability Councils

We appreciate the effort that has gone into the development of the Standard and the opportunity to comment. While supportive of the Standard in concept, the primary concerns identified by MISO staff and stakeholders are:
· There should be some maximum cap on Tv.

· Several people have mentioned that the Standard doesn't require immediate action. While the standard should encourage expeditious response, as the industry found out with the DCS, operators need a few minutes to interpret readings and alarms, select the proper response and then get resources deployed.

· There is still is not a common understanding of an Interconnected Reliability Limit (IRL).

· The only requirement in the standard for Control Areas (BAs) and Transmission Operators is to provide data and follow the direction of the RA (which most people assume is the Reliability Coordinator, but there's not agreement on that). There is no requirement for the TO or BA to take any action (other than wait for the RA to direct them).

· As this Standard is intended to do away with much of Policy 2, 4 and 5, there appears to no longer be a requirement for BA-BA (or TO-TO) communication or coordination.

· The industry and the Standard needs to deal with the reality of the existence of Reliability Coordinators and define their role (Based on the informational Webcast, the drafting team's vision is that the RA is the local operator). There currently exists two tiers of control in the grid, local first response from transmission operators and BAs and a higher level-wider area control by Reliability Coordinators.

Minnesota Power MP Negative

Transmission Owners

NERC_OWL_Standard.doc *29,184 bytes*

There is lack of role clarity regarding coordination of responsibility (and liability) for IROL's.

In the MAPP region, the North Dakota and Manitoba to USA flowgates can be constrained by either thermal limits or stability limits. How could proposed standard 200 be approved for the stability attributes of these flowgates, without consideration of how the thermal attributes of these flowgates will be administered?

Also, in the MAPP region, the St. Paul Reliability Authority function currently provides services for MISO members, non-jurisdictional entities and non-MISO entities. Some of the non-jurisdictional entities have had traditional "first responder" responsibilities (Policies 2, 4 and 5) because it has been determined that they are the ones most able to quickly restore the system to a safe state. The roles of all such entities with regard to proposed standard 200 would need to be understood.

As further authority for managing such operations transfers to the Reliability Authority, the accountability and legal liability that should accompany such authority must also be transferred.

MP concurs with similar comments submitted by the MISO regarding lack of clarity of coordination responsibilities. Also, MP has reviewed and concurs with the comments compiled by WECC (attached).

Mirant Americas Energy Marketing LP MAEM Negative

Electricity Brokers, Aggregators, and Marketers

Reasons for a negative vote include:

- This standard relies on the development of other standards (such as Std. 600 - Determine Facility Ratings, etc.) before it can be implemented. As such, I don't want to pass a standard that is contingent upon the future development of other standards. Along these same lines of thinking, language in the Effective Date and Applicability sections (page 3 of 22) is at a minimum unclear if not contradictory.

-Under Section 201, would like to see a requirement that the RA reveal the list of IROLs and facilities impacted by said IROLs, at a minimum to all RAs (possibly publicly available, but I'm not sure that's the right thing to do) in the relevant interconnection. This would enable necessary coordination of action plans.

-Under Section 201, concerned that a maximum Tv is not defined for the interconnect. Can appreciate the drafting teams intent here (allow flexibility), but we're supposed to be talking about the reliability of the interconnection here, and I have a tough time understanding how there isn't a maximum Tv for the interconnection.

- The standard does not identify the Compliance Monitor. Is the RRC the monitor? NERC? Certainly have a problem with a RRC monitoring a RA when it is the same entity (e.g., MAAC/PJM).

- Concerned with financial sanctions being included at this point. How can this be enforced? My understanding is that not many entities have signed NERC's Reliability Agreement (Agreement for Regional Compliance and Enforcement Programs), enabling the RRCs to enforce compliance programs.

Municipal Electric Authority of Georgia MEAG Negative

Transmission Owners

National Association of Regulatory Utility Commissioners Negative

Federal, State, and Provincial Regulatory or other Government Entities

The proposed standard lacks a definitive statement indicating that it is unacceptable to operate the bulk system beyond established limits and that the system must be returned to a reliable state of operation within a reasonable time frame.

National Grid USA Negative

Transmission Owners

Comments of National Grid on Standard 200

• It is National Grid's position that Tv, the time an IROL can be exceeded without compliance sanctions, be limited to a maximum of 30 minutes as presently stated in NERC Operating Policy 2. The proposed Standard implies that Tv's may be greater than 30 minutes and may represent an acceptable risk to the North American bulk power system. There is no method or criteria established for determining acceptable risk or impact on reliability identified in the Standard or the associated Q&A. Therefore, it is difficult to support the statement that a response time greater than 30 minutes is acceptable.

• The Monetary Sanction Matrix - There is an issue with the inclusion of this monetary sanction matrix and what its implications are. The NPCC CMAS has expressed concern over its inclusion and maintains that the use of market mechanisms where possible, as well as, letters of increasing degrees of severity and

notifications to regulatory agencies are more effective in ensuring compliance. Failure of NERC to gain authority through reliability legislation could result in NERC pursuing actions to implement “Plan B,” a “voluntary” approach affording NERC the authority to perform these types of monetary sanctions. CMAS has indicated that any posted Standard, with the included matrix, should not be supported by NPCC. There are, however, proceedings at NERC by the Compliance Certification Committee (CCC) to address alternative sanction proposals and NPCC will continue to work to oppose monetary sanctions.

• Standard 200 should clearly reflect requirements and measures that require all Reliability Authorities to initiate immediate corrective actions as soon as an Interconnection Reliability Operating Limit (IROL) is exceeded or the system is in an unanalyzed state. It is NPCC’s position that NERC Standards should ensure mitigating actions are implemented when instability, uncontrolled separation, or cascading outages would occur as a result of a change in one or more operating parameter(s) as soon as the condition exists.

• The Standard does not include clear definitions or criteria on how “local” and “Wide Area Impact” are determined. Therefore, it is difficult to assess what electrical boundaries an IROL is meant to protect. This definition of Wide Area Impact points out that the electrical area to be included in the limit may be larger than the portion of the transmission system under the authority of a single Reliability Authority (RA). This indicates the need for studies and associated limits that transcend the boundaries of a single RA's purview, yet there is no formal statement identifying this need in standard, 200, 600 or the Co-ordinate Operations Standard (currently under development).

• It is National Grid’s position that Standard 200 should clearly reflect the fact that IROL's can be dynamic in nature. While it may be possible that every possible configuration can be identified in advance to deal with this dynamics, the reality is that this list would be extremely large and difficult to maintain. To improve on the situation, this section should require that the RA operators have a base set of limits that include N-1 configurations, along with identifying the following:

• The boundary conditions for which the published limits are applicable;
• The critical contingency that drive the applicable limit; and
• An understanding of what the associated limit is designed to protect the system against (i.e. transient stability, voltage decline, etc.)

The System Operators must have the tools, training and information to deal with unforeseen circumstances and make the proper decisions to secure the system in an expeditious and orderly manner following a contingency or other event.

• Section 207, Action Plan. It is National Grid’s position that requiring an Action Plan and its associated steps and procedures for dealing with instances of IROL violations will prove to be restrictive and disallow operators from taking other positive actions than those as outlined in a “plan.” National Grid feels that confining operators to a set of steps for an IROL violation may, at face value appear to be laudable, however may not be in the best interest of correcting the IROL violation for the specific set of system conditions that may exist.

• National Grid further does not support documenting all limit violations, but only those in excess of the time-duration Tv value. This requirement would be a huge effort while providing little or no information, as limits are exceeded for very small amounts of time on a regular basis just by virtue of power system operations.

• There is also an inconsistency throughout the Standard. It is titled differently in different places. The document title is “Operate Within Interconnection Reliability Limits” which is correct, however, all the headers within the document appear as “… Interconnected….” The NERC website incorrectly lists the title using the word Interconnected as well.

Nebraska Public Power District NPPD Negative

Transmission Owners

NPPD does not believe that this standard goes far enough to protect the integrity of the bulk electric system. As stated in version 2 of the Functional Model the transmission operator has the responsibility to operate and direct the operations of the transmission system within equipment and facility ratings. This standard does nothing to require the transmission operator to take action to return the transmission system to an analyzed safe condition. This standard is too narrowly focused and does not provide the industry with the protection to eliminate a repeat of the August 14th blackout.

New Brunswick Power Corporation NBPC Negative

Transmission Owners

The subject Reliability Standard is being balloted for approval on December 18, 2003 through January 6, 2004. I am voting against the Standard “Operate Within Interconnection Reliability Limits,” based on the bullet comments below provided by NPCC's CP9 Working Group.

Of particular concern, is the lack of a 30 minute maximum threshold for reportable IROL violations. These comments may be used in your “NO-with comments” ballots if you are in agreement with our findings. This recommendation is based on information compiled from NPCC’s Task Forces, Compliance Monitoring and Assessment Subcommittee (CMAS), as well as discussions of the Working Group with Mr. Al DiCaprio, PJM, a principle author of the SAR/Standard as well as Mr. Al Miller, a member of the NERC Operating Limit Definition Task Force (OLDTF) and representing the IMO position paper on this Standard.

Outstanding issues supporting our decision and identified through NPCC’s review process are:

It is NPCC’s position that Tv, the time an IROL can be exceeded without compliance sanctions, be limited to a maximum of 30 minutes as presently stated in NERC Operating Policy 2. The proposed Standard implies that Tv’s may be greater than 30 minutes and may represent an acceptable risk to the North American bulk power system. There is no method or criteria established for determining acceptable risk or impact on reliability identified in the Standard or the associated Q&A. Therefore, it is difficult to support the statement that a response time greater than 30 minutes is acceptable.

The Monetary Sanction Matrix - There is an issue with the inclusion of this monetary sanction matrix and what its implications are. The NPCC CMAS has expressed concern over its inclusion and maintains that the use of market mechanisms where possible, as well as, letters of increasing degrees of severity and notifications to regulatory agencies are more effective in ensuring compliance. Failure of NERC to gain authority through reliability legislation could result in NERC pursuing actions to implement “Plan B,” a “voluntary” approach affording NERC the authority to perform these types of monetary sanctions. CMAS has indicated that any posted Standard, with the included matrix, should not be supported by NPCC. There are, however, proceedings at NERC by the Compliance Certification Committee (CCC) to address alternative sanction proposals and NPCC will continue to work to oppose monetary sanctions.

• Standard 200 should clearly reflect requirements and measures that require all Reliability Authorities to initiate immediate corrective actions as soon as an Interconnection Reliability Operating Limit (IROL) is exceeded or the system is in an unanalyzed state. It is NPCC’s position that NERC Standards should ensure mitigating actions are implemented when instability, uncontrolled separation, or cascading outages would occur as a result of a change in one or more operating parameter(s) as soon as the condition exists.

• The Standard does not include clear definitions or criteria on how “local” and

"Wide Area Impact" are determined. Therefore, it is difficult to assess what electrical boundaries an IROL is meant to protect. This definition of Wide Area Impact points out that the electrical area to be included in the limit may be larger than the portion of the transmission system under the authority of a single Reliability Authority (RA). This indicates the need for studies and associated limits that transcend the boundaries of a single RA's purview, yet there is no formal statement identifying this need in standard, 200, 600 or the Co-ordinate Operations Standard (currently under development).

It is NPCC's position that Standard 200 should clearly reflect the fact that IROL's can be dynamic in nature. While it may be possible that every possible configuration can be identified in advance to deal with this dynamics, the reality is that this list would be extremely large and difficult to maintain. To improve on the situation, this section should require that the RA operators have a base set of limits that include N-1 configurations, along with identifying the following:

The boundary conditions for which the published limits are applicable;
The critical contingency that drive the applicable limit; and
An understanding of what the associated limit is designed to protect the system against (i.e. transient stability, voltage decline, etc.)

The System Operators must have the tools, training and information to deal with unforeseen circumstances and make the proper decisions to secure the system in an expeditious and orderly manner following a contingency or other event.

Section 207, Action Plan. It is NPCC's position that requiring an Action Plan and its associated steps and procedures for dealing with instances of IROL violations will prove to be restrictive and disallow operators from taking other positive actions than those as outlined in a "plan." NPCC feels confining operators to a set of steps for an IROL violation may, at face value appear to be laudable, however may not be in the best interest of correcting the IROL violation for the specific set of system conditions that may exist.

We further do not support documenting all limit violations, but only those in excess of the time-duration Tv value. This requirement would be a huge effort while providing little or no information, as limits are exceeded for very small amounts of time on a regular basis just by virtue of power system operations.

There is also an inconsistency throughout the Standard. It is titled differently in different places. The document title is "Operate Within Interconnection Reliability Limits" which is correct, however, all the headers within the document appear as "… Interconnected…." The NERC website incorrectly lists the title using the word Interconnected as well.

New York Power Authority MED Negative

Load Serving Entities (LSEs)

We are are supportive of the comments supplied by the NPCC CP-9 working group.

New York Power Authority NYPA Negative

Transmission Owners

NYPA is supportive of the following comments developed through the NPCC CP-9 working group with respect to this standard.
Outstanding issues supporting our decision and identified through NPCC's review process are;

• The Monetary Sanction Matrix- There is an issue with the inclusion of this monetary sanction matrix and what its implications are. The NPCC CMAS has expressed concern over its inclusion and maintains letters of increasing severity for non-compliance are more effective in ensuring compliance. Failure of NERC to gain authority through reliability legislation will result in NERC Pursuing actions to implement "Plan B", a "voluntary" approach affording NERC the authority to

perform these types of monetary sanctions and CMAS has indicated that the standard with the included matrix should not be supported by NPCC. There are proceedings at NERC by the Compliance Certification Committee (CCC) to deal with alternative sanction proposals.

• Standard 200 should clearly reflect requirements and measures that require all Reliability Authorities to initiate corrective actions as soon as an Interconnection Reliability Operating Limit (IROL) is exceeded. It is NPCC's position that it should be ensured mitigating actions are implemented when instability, uncontrolled separation, or cascading outages would occur as a result of a change in one or more operating parameter(s) as soon as the condition exists.

• It is NPCC's position that Tv, the time an IROL can be exceeded without compliance sanctions, be limited to a maximum of 30 Minutes as presently stated in Operating Policy 2. The proposed Standard implies a Tv greater than 30 minutes is allowable and may represent an acceptable risk. There is no method or criteria established for determining acceptable risk or impact on reliability identified in the Standard or the associated Q&A. Therefore it is difficult to support the statement that a response time greater than 30 minutes is acceptable.

• The Standard does not include clear definitions or criteria on how a "local" and "Wide Area Impact" are determined. Therefore, it is difficult to assess what electrical boundaries an IROL is meant to protect. This definition of Wide Area Impact points out that the electrical area to be included in the limit may be larger than the portion of the transmission system under the authority of a single Reliability Authority (RA). This indicates the need for studies and associated limits that transcend the boundaries of a single RA's purview, yet there is no formal statement identifying this need in standard, 200, 600 or the Co-ordinate Operations Standard (currently under development).

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• There is also an inconsistency throughout the Standard. It is titled differently in different places. The document title is "Operate Within Interconnection Reliability Limits" which is correct however all the headers within the document appear as "… Interconnected…". Also, the NERC website incorrectly lists the title using the word Interconnected as well.

New York State Public Service Commission Negative

Federal, State, and Provincial Regulatory or other Government Entities

The proposed standard lacks a definitive statement indicating that it is unacceptable to operate the bulk system beyond established limits and that the system must be returned to a reliable state of operation within a reasonable time frame.

The webcast discussion regarding this proposed standard indicated several outstanding issues that should be addressed by the standard drafting committee.

New York State Reliability Council Negative

Regional Transmission Organizations (RTOs), Independent System Operators (ISOs), and Regional Reliability Councils

1. Allowing Tv to exceed 30 minutes as permitted by proposed Standard 200 would degrade NERC criteria and therefore would threaten reliability by increasing the risk of voltage instability, cascading outages, and uncontrolled system separation.

The existing NERC Policy 2 limits the time an IROL shall be exceeded to 30 minutes. Permitting a Reliability Authority to establish a Tv in excess of 30 minutes for certain IROLs, as permitted by the proposed Standard 200, implies that not restricting the maximum value of Tv poses no threat to reliability. However, we know of no method for calculating the reliability risk of increasing Tv above 30 minutes. Moreover, if Reliability Authorities were permitted the option of expanding Tv beyond 30 minutes according to what they perceive as acceptable risk, the reliability of neighboring systems will be impacted by decisions they have no control over.

In addition, proposed Standard 200 fails to clearly require the Reliability Authority to initiate corrective actions as soon as a limit is exceeded.

We believe it is an unwarranted risk for Standard 200 to degrade present NERC criteria, particularly in the aftermath of the August 14, 2003 Blackout.

It should be stated in Standard 200 that more stringent criteria than specified in the Standard may be adopted by a Region or sub-region, even if not specifically identified in the Regional Differences section.

2. The New York State Reliability Council is opposed to monetary sanctions

The New York State Reliability Council (NYSRC) is opposed to monetary sanctions as the only option for dealing with noncompliance as applied in this and other proposed NERC standards. Unfortunately, direct monetary sanctions invite “gaming the system”, and encourage “business” decisions based on potential profits or savings versus potential penalties. Instead of monetary sanctions, the NYSRC prefers that NERC have authority to issue letters of increasing degrees of severity to communicate non-compliance of standards. The use by the NYSRC and NPCC of letters to regulatory agencies for non-compliance has demonstrated that they are a very effective tool for ensuring adherence to standards; such letters establish the basis for liability in the event of a subsequent criteria violation; and in the case of market participant noncompliance, threaten the violator’s ability to continue to do business with or through an ISO or RTO. Moreover, letters that communicate noncompliance best allow focus on the “root cause” of a violation, as well as its reliability impact. Therefore, the NYSRC strongly recommends removal of monetary sanction matrices from this standard as well as future NERC standards, and consider instead the use of letters such as those presently applied by the NYSRC and NPCC.

Niagara Mohawk NMPC Negative

Load Serving Entities (LSEs)

• Tv, the time an IROL can be exceeded without compliance sanctions, should be limited to a maximum of 30 minutes as presently stated in NERC Operating Policy

2. The proposed Standard implies that Tv's may be greater than 30 minutes and may represent an acceptable risk to the North American bulk power system. There is no method or criteria established for determining acceptable risk or impact on reliability identified in the Standard or the associated Q&A. Therefore, it is difficult to support the statement that a response time greater than 30 minutes is acceptable.

• The Monetary Sanction Matrix - There is an issue with the inclusion of this monetary sanction matrix and what its implications are. The NPCC CMAS has expressed concern over its inclusion and maintains that the use of market mechanisms where possible, as well as, letters of increasing degrees of severity and notifications to regulatory agencies are more effective in ensuring compliance. Failure of NERC to gain authority through reliability legislation could result in NERC pursuing actions to implement "Plan B," a "voluntary" approach affording NERC the authority to perform these types of monetary sanctions. CMAS has indicated that any posted Standard, with the included matrix, should not be supported by NPCC. There are, however, proceedings at NERC by the Compliance Certification Committee (CCC) to address alternative sanction proposals and NPCC will continue to work to oppose monetary sanctions.

• Standard 200 should clearly reflect requirements and measures that require all Reliability Authorities to initiate immediate corrective actions as soon as an Interconnection Reliability Operating Limit (IROL) is exceeded or the system is in an unanalyzed state. It is NPCC's position that NERC Standards should ensure mitigating actions are implemented when instability, uncontrolled separation, or cascading outages would occur as a result of a change in one or more operating parameter(s) as soon as the condition exists.

• The Standard does not include clear definitions or criteria on how "local" and "Wide Area Impact" are determined. Therefore, it is difficult to assess what electrical boundaries an IROL is meant to protect. This definition of Wide Area Impact points out that the electrical area to be included in the limit may be larger than the portion of the transmission system under the authority of a single Reliability Authority (RA). This indicates the need for studies and associated limits that transcend the boundaries of a single RA's purview, yet there is no formal statement identifying this need in standard, 200, 600 or the Co-ordinate Operations Standard (currently under development).

• It is NPCC's position that Standard 200 should clearly reflect the fact that IROL's can be dynamic in nature. While it may be possible that every possible configuration can be identified in advance to deal with this dynamics, the reality is that this list would be extremely large and difficult to maintain. To improve on the situation, this section should require that the RA operators have a base set of limits that include N-1 configurations, along with identifying the following:

-The boundary conditions for which the published limits are applicable;
-The critical contingency that drive the applicable limit; and
-An understanding of what the associated limit is designed to protect the system against (i.e. transient stability, voltage decline, etc.)

The System Operators must have the tools, training and information to deal with unforeseen circumstances and make the proper decisions to secure the system in an expeditious and orderly manner following a contingency or other event.

• There is also an inconsistency throughout the Standard. It is titled differently in different places. The document title is "Operate Within Interconnection Reliability Limits" which is correct, however, all the headers within the document appear as "… Interconnected…." The NERC website incorrectly lists the title using the word Interconnected as well.

Northeast Power Coordinating Council Negative

Regional Transmission Organizations (RTOs), Independent System Operators (ISOs), and Regional Reliability Councils

NPCC vote NERC_STD200.doc *33,792 bytes*

Northeast Utilities NU Negative

Transmission Owners

The Standard must, as a minimum, clearly define the acceptable time of violation for each IROL. The Standard is developed to address contigencies that could result in instability, voltage collapse, uncontrolled separation and/or cascading outages that could impact the integrated bulk power system.

The Standards also needs to clarigy the expectations of Section 207. Does Section 207 allow for high level guides/guidelines coupled with highly trained operators to make the proper and timely decision(s) or does it require the existence of a step-by-step procedure for each possible contingency.

We endorse the comments submitted by NPCC with its vote to reject the Standard. The revised Standard needs to appropriately address these concerns if the Standard is to be accepted by the industry.

NorthWestern Energy NWMT Affirmative

Transmission Owners

Nova Scotia Power NSPI Negative

Transmission Owners

Std 200 Op W_in Limits Comments.doc *73,728 bytes*

NSPI is in agreement with the comments stated in the attached NPCC letter.

D Little

NYISO Negative

Regional Transmission Organizations (RTOs), Independent System Operators (ISOs), and Regional Reliability Councils

NERC Standard 200 - IRC Comments 040105.doc *27,136 bytes*

NYISO's negative voted is based on concerns raised by the issues described in the ISO/RTO Council's comments.

Additionally, the NYISO concurs with the issues and concerns submitted by the NPCC...

OGE Energy Resources OERI Affirmative

Electricity Brokers, Aggregators, and Marketers

Oklahoma Gas and Electric OKGE Negative

Transmission Owners

201(e)(4) The SDT needs to revisit the levels of non-compliance associated with this standard. If compliance is truly a black/white issue with no shades of gray as the proposed levels indicate, why not have just a level one with no financial penalty? The proposed non-compliance level implies that it may be more important to have a list of IROLs rather than a correct list of IROLs. Also, if no IROLs exist, there will be no list which would cause the reliability authority to be in non-compliant. There needs to be consistency throughout all the standards on documentation-type non-compliance.

202(e) Again the issue of degrees of non-compliance surfaces. Are there shades of

gray with non-compliance for this standard or is it strictly a black and white issue? Why jump directly to level four non-compliance? Is progressive non-compliance not an option? For example, if a reliability authority had identified 25 IROLs, he is level four non-compliant if only one of the IROLs is not available for real-time use. Shouldn't there be allowances for such situations? Also, perhaps a letter that lists critical displays and identifies discrepancies would be more beneficial to maintaining interconnection reliability than a monetary penalty.

203(b) The proposed measures may be too weak. For example, it appears that a reliability authority could satisfy the operational planning analysis by evaluating an invalid case for a given day. While it meets the letter of the measure, it doesn't meet the intent of the measure. Also, does (b)(1)(ii) apply to IROLs that are associated with stability limits? If so, this measure would require a reliability authority to run real-time stability analyses every 30 minutes.

203(e) Again the issue of degrees of non-compliance surfaces. Are there shades of gray with non-compliance for this standard or is it strictly a black and white issue? Why jump directly to level three non-compliance? Is progressive non-compliance not an option? Is missing an operational planning assessment one day in a month as detrimental as missing it 10-15 days per month? Similarly, is missing one real-time assessment as bad for reliability as missing these assessments for hours, on a regular basis?

205(e) Requirements (a)(i), (a)(ii) and (a)(iii) are too open-ended on the part of the reliability authority. Justification should be required for all requested data to prevent unreasonable and burdensome requests on the part of the reliability authority. The data requested and the timing of the delivery of the data should be mutually agreeable to the reliability authority and the responding entity.

The standard should include a minimum, default set of data, such as that spelled out in Appendix 4B, and provide that as a guide for types of data that may be requested.

Requirement (a)(iii) appears to be repeated again as a measure in Measure (b)(iii). Shouldn't Requirement (a)(iii) be moved to Standard 206 since it deals with provision of the data? In fact, there is a great deal of material in 205 that is related data provision. Shouldn't all of this be moved to 206? Perhaps additional clarification between 205 and 206 is all that is needed.
206(e) Only one data point out of potentially thousands of points could cause non-compliance as specified in (e). This implies that nothing less than 100% of the data, 100% of the time is sufficient. Is this the intent of the standard? Is a transducer failure in a remote substation as damaging to reliability of the interconnection as the loss of an entire ICCP link between a responding entity and its reliability authority? Is a failure for one scan cycle as critical as that point not being available for days or weeks? It would appear that non-compliance associated with this standard needs revisiting.

There appears to be inconsistency between non-compliance in 205 and 206. If a reliability authority makes an unreasonable data request in 205 and doesn't get the requested data within the specified timeframe, then the reliability authority is only penalized at a level one. But if a responding entity loses one data point for one four-second data scan, that responding entity is blasted with a level four penalty. There does not appear to be equity here.

208(a)(1) Generator operators need to be added to the entities listed.

Requirement (a)(ii) is repeated again in Measure (b)(i).

The levels of non-compliance need to be reviewed to ensure that they accurately reflect how well the directives were followed. Timing of actions taken with regards to when the directives were issued should also be considered.

Oklahoma Gas and Electric OKGE — Negative

Electric Generators

Omaha Public Power OPPD — Negative

Transmission Owners

Oncor — Affirmative

Transmission Owners

Ontario - Independent Electricity Market Operator IMO — Negative

Regional Transmission Organizations (RTOs), Independent System Operators (ISOs), and Regional Reliability Councils

NERC Standard 200 - IMO Comments 040106.doc *57,344 bytes*

Ontario Power Generation Inc OPG — Negative

Electric Generators

SECTION 201:
Tv needs to be specified and should be consistent, at least across each interconnection.

SECTION 201:
Reliability Authorities should be obligated to publish, for market participant use, the list of facilities which they are monitoring and the limits on those facilities. In part, this will insure appropriate coordination between adjacent RAs.

SECTION 206:
Entities obliged to provide data to RAs under this section of the Standard should have a means of appealing the decision of the RA on the grounds of relevance.

SECTION 206:
This section identifies levels of non-compliance and in this case, the only applicable level is level 4, which appears to be unnecesarily harsh.

SECTION 207:
This section identifies the need for RAs to have an action plan for dealing with the exceedances of IROLs. However, such a plan can have substantial commercial implications and the Standard provides no guideline for defining the plan or the mechanism by which a proposed plan can be challenged or modified to mitigate the commercial impacts. OPG believes the most appropriate approach would be to develop plan(s) through NAESB, for adoption by RAs, prior to implementation of this NERC standard.

OPPD Energy Marketing OPPM — Negative

Electric Generators

Orlando Utilities Commission OUCT — Negative

Load Serving Entities (LSEs)

FRCC comment on OWL ballot.doc *22,528 bytes*

OTP Wholesale Marketing OTPW — Negative

Load Serving Entities (LSEs)

OTP Wholesale Marketing OTPW Negative

Electricity Brokers, Aggregators, and Marketers

Otter Tail Power Company OTP Negative

Transmission Owners

Otter Tail Power Company OTP Negative

Electric Generators

Pacific Gas & Electric Company PGEU Negative

Electric Generators

Comments for OWL standard 010604.doc *21,504 bytes*

Pacific Gas & Electric PGAE Negative

Transmission Owners

As written, this posted Standard 200 could degrade system reliability since it only requires that the system be operated to avoid instability, uncontrolled separation or cascading. In truth, the system should also be operated within other limitations, such as equipment thermal ratings, generator capability limits, etc.

This posted Standard 200 may be confusing to implement. It defines Interconnection Reliability Operating Limit (IROL) to be “a system operating limit which, if exceeded, could lead to instability, uncontrolled separation, or cascading outages that adversely impact the reliability of the bulk transmission system”. Its supporting documents also state that the IROL is a subset of the System Operating Limits to be determined according to Standard 600 – Determine Facility Ratings, System Operating Limits (SOL), and Transfer Capabilities, now being drafted. Standard 600 requires that the SOL be determined such that, among other things, all Facilities are operating within their applicable thermal, frequency and voltage limits, in addition to avoidance of instability, uncontrolled separation, or cascading. As such, this Standard 200 could be operating to limits different from the requirements set forth in Standard 600. This leaves the Reliability Authority in an untenable position – it would either have to operate to a set of IROLs that would not meet the requirements in Standard 600, or a set of IROLs that are different than required by Standard 200.

PECO Energy Company Negative

Load Serving Entities (LSEs)

PJM Interconnection Affirmative

Regional Transmission Organizations (RTOs), Independent System Operators (ISOs), and Regional Reliability Councils

Platte River Power Authority TP PRPA Negative

Transmission Owners

See WECC comments.

Power Pool of Alberta PPOA Negative

Regional Transmission Organizations (RTOs), Independent System Operators

(ISOs), and Regional Reliability Councils

- Standard 200 should be changed to require that: corrective actions be taken immediately once an Interconnection Reliability Operating Limit (IROL) is exceeded, and the parameter Tv, the time an Interconnection Reliability Operating Limit can be exceeded without compliance sanctions being applied, be limited to a maximum value of 30 minutes.

- Standard 200 needs enhanced definitions of IROL and wide area impact, in order to more precisely define the portions of power systems that IROLs are meant to protect. At a minimum there should be recognition of the need for adjacent Reliability Authorities to reach a common understanding of wide area impact.

- Standard 200 should be changed to clearly reflect th fact that IROLs can be dynamic in nature.

- we see a requirement to enhance Section 203 (b), Measures, Analyses and Assessments. Measures (1)(i) as stated require "... an operating planning analysis [be conducted] at least once each day, evaluating th next day's projected system operating conditions". We propose that a review of the next day's projected system operating conditions, against a pre-described set of operating conditions that governs IROLs, conducted at least once each day, should be considered an alternative to the above measure.

PPL Generation Affirmative

Electric Generators

PSEG Energy Resources & Trade LLC PS Negative

Electricity Brokers, Aggregators, and Marketers

NercVote.doc *19,968 bytes*

PSEG Power LLC Negative

Electric Generators

Vote comments.pdf *3,652 bytes*

Public Service Company of New Hampshire PSNH Negative

Load Serving Entities (LSEs)

The primary objection is that this standard would now allow a Reliability Authority (RA) to define the acceptable time of violation of each IROL. We now operate with the expectation that the transmission system will be returned to within Operating Security Limits as soon as possible, but no longer than 30 minutes. Given the August 14 Blackout, how can we as an industry allow an RA to lesson this expectation?

Pending the outcome of this vote, I would prefer to see the drafting team re-consider this important issue, and other issues consolidated and submitted by NPCC thru their technical committees, and submit a new draft standard for re-vote.

Public Service Electric and Gas Company Negative

Transmission Owners

The present language of the Standard proposed for Ballot must be modifed to include the following issues;
1) There must be a provision clearly stating that the Reliability Authorities have authority over all entities that operate within the RA area of responsibility.
2) The RA must publically post the Operating Limits and time limits for all facilities under their jurisdiction.

3) The RA is required to ensure that all facilities monitored within their area of responsibility are consistently determined and shared with adjacent RAs.

Public Service Electric and Gas Company Negative

Load Serving Entities (LSEs)

While the language of the standard is acceptable as far as it goes, it needs to be supplemented in order to accomplish its intended purpose. Accordingly, language must be added to address the following:

(1) There must be an express provision stating that Reliability Authorities have authority over all entities with facilities or operating within the RA's footprint. (Section 204)

(2) In the interest of transparency of operating requirements, a provision requiring that the RA publicly and timely post the operating limits and time limits for every facility for which they have established such must be added. Such posting should be made on each OASIS covering any portion of the RA's footprint. (Section 201)

(3) The RAs should be required to carry out their Action Plan reliability responsibilities in such a manner to ensure seamless operations and markets within their footprints and that of interconnected RAs. (Section 207)

(4) The RAs should be required to ensure that the facilities monitored and the physical and time limits are consistently determined within their footprint and coordinated with interconnected RAs to ensure consistency. (Section 201)

(5) Whatever emergency ratings are implemented by the RA, e.g., 24-hour, 4-hour, 30-minute, etc., the RA must possess the ability to relieve actual post-contingency overloads to acceptable levels within the time limit allowed by the particular rating invoked. (Section 201)

Public Works Commission Fayetteville PWCF Negative

Transmission Dependent Utilities

Although I agree with the standard in principle, I feel that the concerns expressed by WECC and other parties need to be addressed and the standard resubmitted.

Reedy Creek Improvement District RC Negative

Load Serving Entities (LSEs)

Please see comments provided by the Florida Reliability Coordinating Council of which Reedy Creek Improvement District is in general concurrence.

Reedy Creek Improvement District RC Negative

Transmission Dependent Utilities

RCID concurs with the comments of the FRCC relating to the Interconnection Reliabiltity Operating Limits Standard.

Reedy Creek Improvement District RC Negative

Electric Generators

RCID concurs with the comments of the FRCC relating to the Interconnected Reliability Operating Limits Standard.

Reedy Creek Improvment District Marketing RCM Negative

Electricity Brokers, Aggregators, and Marketers

RCID concurs with the comments provided by the FRCC as it relates to Operating within Interconnetion Reliability Operating Limits.

Reliant Resources Inc RRI Negative

Electric Generators

Reliant Energy Comments on NERC Standard 200.doc *22,528 bytes*

Sacramento Municipal Utility District SMUD Negative

Transmission Owners

The definition of "Wide Area Impact" is overly broad.

Salt River Project SRP Negative

Transmission Owners

See WECC comments.

Santee Cooper SC Affirmative

Transmission Owners

Savannah Electric and Power Negative

Load Serving Entities (LSEs)

~$uthern Company-recommendation on the OWL standard ballot_rev1.doc *162 bytes*

SCANA Energy Marketing SCAN Negative

Electricity Brokers, Aggregators, and Marketers

Seminole Electric Cooperative SEC Negative

Transmission Dependent Utilities

FRCC comment on OWL ballot.doc *24,064 bytes*

I endorse the attached comments developed in the FRCC.

Seminole Electric Cooperative SEC Negative

Electric Generators

FRCC comment on OWL ballot.doc *24,064 bytes*

Seminole Electric Cooperative SEC Negative

Electricity Brokers, Aggregators, and Marketers

FRCC comment on OWL ballot 12-17.doc *27,648 bytes*

Seminole supports comments filed by FRCC which are attached.

Snohomish County PUD SNPD Affirmative

Transmission Dependent Utilities

South Carolina Electric & Gas Company SCEG Negative

Transmission Owners

My “No” vote is supported by these general comments:

This standard places a lot of emphasis on IROLs, however, no guidelines on how to determine an operating limit have yet been determined. It goes further by allowing an arbitrary 30 minute time limit – why not 15, 5, or 0 minutes? Some limits cannot be surpassed by 15 minutes, yet the standard allows for it. In another respect, some limits can be exceeded for far more that 30 minutes depending on the situation, but the standard ignores that. I know this standard is not meant to define limits, but how can one be expect to agree to its requirements until the definition of limits is better defined?

This standard assumes that all RAs are large enough to affect the interconnection as a whole. An IROL is defined as a limit that if exceeded could lead to instability, uncontrolled separation, etc... that adversely impacts the reliability of the bulk transmission system. Until all RAs have been determined, there is no way of determining if this requirement is applicable to them. The standard does not address the situation where this requirement is not applicable, and assumes that all RAs will have at least one facility subject to an IROL. This is important because an RA that is small enough can blackout its entire system without causing an uncontrolled separation or blackout for the rest of the interconnection.

In conclusion, this standard should not be approved until:
1. The definition of Limits and determination of IROLs is sufficiently defined.
2. All RAs have been determined and certified.

South Mississippi Electric Power Association SME Negative

Load Serving Entities (LSEs)

Southeastern Electric Reliability Council Negative

Regional Transmission Organizations (RTOs), Independent System Operators (ISOs), and Regional Reliability Councils

Once Tv is violated there needs to be an incentive to get it back within limits soon. As currently written, the standard does not distinguish between short and long Tv violations.

The Standard needs to recognize the link between it and the Determine Facility Ratings Standard. This standard should be delayed until the Determine Facility Ratings Standard has been released for vote.

References to the Functional Model are not current and should be.

Southeastern Power Administration SEPA Negative

Transmission Dependent Utilities

Southeastern Power Administration SEPA Negative

Electric Generators

Southern California Edison SCET Negative

Transmission Owners

Southern California Edison SCET Negative

Electric Generators

See WECC's comments on standard.

Southern Company Services SOCO Negative

Transmission Owners

Southern Company-recommendation on the OWL standard ballot_rev1.doc
43,008 bytes

Southern Company Services SOCO Affirmative

Electric Generators

Southern Company Review of
Standard 200 for Ballot
Operate Within Interconnected Reliability Operating Limits

General
It appears that there were some standard responses that the SDT developed and used for most of the comments. It did not appear that all comments were given their due consideration.

The functional model is used in the standards even before it is finalized. This could be an issue.

The concept of operating to first contingency seems lost except where it is covered in the Determine Facility Ratings Standard. The idea that you are trying to protect for these circumstances should at least be mentioned in Standard 200. Southern thinks there should be additional verbiage in Standard 200 linking to the Determine Facility Ratings Standard's methodology for establishing limits.

Southern believes that the time an IROL is exceeded should be considered in levels of non-compliance or penalties. Once Tv is violated, there needs to be an incentive to get it back within limits sooner rather than later. As currently written, the standard does not distinguish between violations that last for Tv + 5 minutes vs. Tv + 5 hours.

Standard 200 and the Determine Facility Ratings Standard are inherently strongly linked. However, there is little verbiage in Standard 200 referencing this linkage. In addition, the Determine Facility Ratings Standard is not yet finalized or approved so there is no way to know what will be in the final version. Since many of the underlying principles of Standard 200 relies on the Determine Facility Ratings Standard, the fact that the basis for much of Standard 200 in not approved creates a large unknown. For these reasons, Southern feels that the Determine Facility Ratings Standard needs to be approved PRIOR to Standard 200.

Overall, this standard ignores Good Utility Practice and the Transmission Owners fiduciary responsibilities and liability concerns. It thereby ignores the coordination of responsibilities among the industry entities, and the standard should have these two definitions modified.

Tv Issue
The following was noted as major difference #2 in the associated Q & A document: "Tv: The maximum time that an interconnection reliability operating limit can be exceeded without compliance sanctions being applied.

By definition, all IROLs are significant and impact the reliability of the Interconnection. Therefore, the reasoning for allowing an RA the full range to determine Tv is especially bothersome. The best compromise is for the standard to set a maximum Tv and allow the RAs to set it up to that cap. In addition, although various market solutions can/should be used to manage the system in an attempt to avoid IROLs, it should not dictate or drive what Tv should be set at. Tv should be set according to the severity of the situation, not according to the least cost/least impact to the market. Once you are dealing with IROLs and into the Tv period, you are at a critical operating state. In a response to comments the SDT stated, "Including specific language that references tariffs and market issues is outside the scope of NERC's reliability standards." Not only should specific language that references markets be absent, but those markets should not drive aspects of reliability standards to the detriment of reliability.

Please note in the excerpt below that each RA may use whatever system it wants for choosing Tv. This will certainly be an important issue along seams, especially if there is no limit for Tv.
"How do you establish a Tv for an IROL?
Each RA may use whatever system it wants for establishing a Tv for its IROLs. This gives each RA the latitude to be as conservative as it desires. Some RAs may choose to use a default Tv of 30 minutes — currently some entities have a default of 20 minutes for all limits that would be categorized as IROLs. One of the benefits of this variable Tv is that it gives an RA that operates in a market environment greater flexibility before implementing remedial actions that have the effect of negatively impacting that market."

Southern recommends a cap (maximum) for Tv of 30 minutes. The 30-minute limit is the best benchmark we have as a maximum value and should be considered as the cap unless an alternative value can be shown to be more appropriate.

Documentation of Events
Although the standard states that all instances of exceeding IROLs must be documented (reference excerpt from the definitions below), they are not required to be sent to NERC or the Regions. These "near miss" situations (where the IROL is mitigated in under Tv) contain valuable information and should be reported as well. By tracking these near misses, the compliance monitor can determine how close to the edge the system is being operated. Analysis of this data could indicate that Tv is being used as a grace period, which is in direct conflict with the OLDTF's recommendations and good utility practice . However, there does not appear to be a compliance "hammer" to prevent entities from using Tv as a grace period. This should somehow be incorporated into the levels of non-compliance and penalties.

Southern recommends that near misses be reported to the Region.

Wide Area/Local Area
The following definition is included in the standard. Although this is a start in the right direction, the NERC OC indicated a need for better defining wide and local areas. It seems that it would be prudent to wait and include any clarifications to the definitions from the OLDTF and/or RCWG. This is an example of two different, but related objectives working on incongruous timetables.

As interpreted from the note pertaining to definitions on page 1 of the standard, a vote for approving this standard also approves the definitions within even though the definitions will be pulled out into a separate definitions document. If the separate definitions document can then be easily modified according to subsequent recommendations from the OLDTF and RCWG, this would help alleviate this issue.

IROL Responsibility
The standard has been changed so that the RA is the responsible party for

managing IROLs. Although the supporting documentation for this standard indicates that responsibilities CAN be delegated (see excerpt below), it is important to note that the ultimate responsibility lies with the RA and the standard itself does not speak to a delegation of responsibilities.

Documenting lists of IROLs
The standard still seems to indicate a somewhat static list of IROLs. The SDT added a few words about the list having to be updated, but did not adequately address some other issues:
“What happens if you identify another (unexpected) limit during real-time that is not on the list? Are you not responsible for this case as well? We all know that planning studies cannot predict all the challenges that are faced in real-time.”

The list of IROLs is a dynamic list. Standard 200 needs clear verbiage noting the dynamic nature of this list. In addition, the standard should not imply that if the limit is not on the list that you don’t have to operate to it. The not-previously-identified events that would place you in an IROL should have the same requirements as those already on the list. In section 203, part b, “identified” should be removed from the last part of the sentence:
“The Reliability Authority shall identify operating situations or events that impact its Reliability Authority Area’s ability to operate without exceeding any Interconnection Reliability Operating Limits.”

IROL violation Report Form
The form does not appear to capture some pretty important data, such as affected parties and narrative on the event. Also, this is the first opportunity for “the world” to review the actual form. It was only referenced in previous postings.

Southern Company Services SWE — Affirmative

Electricity Brokers, Aggregators, and Marketers

For Tv related to an Interconnected Operating Reliability Limit, IROL: The Standard allows the Reliability Authority to identify the Tv for each IROL. It is recommended that the Tv time limit not be open ended but require the RA to establish a maximum time limit of 30 minutes (as current policy requires) to return to normal operating conditions. It could be less if the RA deems it necessary.

Southwest Transmission Cooperative SWTC — Affirmative

Transmission Owners

Southwestern Power Administration SWPA — Negative

Transmission Owners

State of Maine — Negative

Small Electricity End Users

Tampa Electric Company TEC — Negative

Transmission Owners

Tampa Electric Company TEC — Negative

Load Serving Entities (LSEs)

The FRCC supports the development of a standard that requires operating within Interconnected Reliability Operating Limits. However, we are voting no in this ballot, as we believe that there is still work to do in refining this particular standard. The following questions and comments are provided to help the drafting team understand our concerns.

o The understanding of the Reliability Authority is very critical in interpreting this standard. It appears to us that this standard is written with the RA being the entity today that is the Reliability Coordinator. This confusion was discussed on the Web cast conference call, and it was stated by the Chair of the drafting team, that the RA is not the RC of today. The RA in this standard needs “wide area oversight” to perform the requirements of this standard. We have concern, especially with requirement 208, about how a RA (who is not a RC of today) can issue directives to TO’s, BA’s, IA’s and other RA’s if they are not within their reliability area. If the functional model allows an individual CA/TO of today to be a RA tomorrow, it looks like they are giving directives to themselves. So it looks like the RA as defined in version 2 of the functional model does not fit the needs of this standard. That may be more of a problem with interpretation of the functional model than this standard, but until that confusion is cleared up, we have trouble approving this draft.

o The implementation plan states (pg 8) that this standard would not be implemented until after the Determine Facility Ratings standard has been implemented. If this is true, it does not make sense to approve this, especially with outstanding issues, until after the Determine Facility Ratings standard is completed and approved. Also, on the Web cast, when we asked about the ability of the RA to direct other RA’s (it is not stated in 208), we were told that the Coordinate Operations Standard would take care of that. Does that mean that this standard is also dependent on the Coordinate Operations standard being in place first?

o We were unsure if an IROL event would be pre-contingency or post-contingency. This question was raised on the web cast, and it sounded like the answer was that the IROL events were all “real-time”. We wondered if Tv should be 0 for a real-time event and something greater than 0 for a pre-contingency event. The definition of Tv states that it is the maximum time the system operator has to return to a state that is at or below the limit before being subjected to compliance sanctions. We believe this is an inadequate definition. Tv should not be based on when compliance sanctions begin, but rather on the time the RA is willing to risk the system. This also depends whether it is pre or post contingency. It is clear that more work needs to be done in clarifying this definition.

o The definition of Bulk Electric System is circular and does not help anyone understand what is the Bulk Electric System. In fact, the interim blackout report has a definition that is more specific, but we are not even sure if that is the definition that has been used in other NERC policies and standards.

o The definition of Wide Area Impact is really the same as the definition of IROL. This definition does not help anyone understand what a wide area really is either.

We have other minor comments, but these are our primary concerns. We would recommend that this draft standard be returned to the drafting process for re-posting and comment. Once all the comments and concerns have been addressed, it should be re-balloted.

Tampa Electric Company TEC Negative

Electric Generators

Tampa Electric Company TEC Negative

Electricity Brokers, Aggregators, and Marketers

The FRCC supports the development of a standard that requires operating within Interconnected Reliability Operating Limits. However, we are voting no in this ballot, as we believe that there is still work to do in refining this particular standard. The following questions and comments are provided to help the drafting team understand our concerns.

o The understanding of the Reliability Authority is very critical in interpreting this standard. It appears to us that this standard is written with the RA being the entity

today that is the Reliability Coordinator. This confusion was discussed on the Web cast conference call, and it was stated by the Chair of the drafting team, that the RA is not the RC of today. The RA in this standard needs “wide area oversight” to perform the requirements of this standard. We have concern, especially with requirement 208, about how a RA (who is not a RC of today) can issue directives to TO’s, BA’s, IA’s and other RA’s if they are not within their reliability area. If the functional model allows an individual CA/TO of today to be a RA tomorrow, it looks like they are giving directives to themselves. So it looks like the RA as defined in version 2 of the functional model does not fit the needs of this standard. That may be more of a problem with interpretation of the functional model than this standard, but until that confusion is cleared up, we have trouble approving this draft.

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Tenaska Inc Negative

Electric Generators

Data requirements in Section 205 need to be more specific to prevent burdensome, discriminatory requests for data. Also, the data request should only be for reliability information and not for competitive cost information. Section 208 should be applicable to anyone who has the ability to impact reliability on the bulk system (transmission owners, transmission operators, generators, load serving entities, etc.). It appears that Section 201 gives tremendous latitude for the reliability authorities to pick and choose what facilities are included which could lead to discriminatory practices. Some more specific language should be added to identify what facilities are in or out.

Tennessee Valley Authority Negative

Electric Generators

Tennessee Valley Authority - Transmission/Power Supply Negative

Transmission Owners

The resolution of industry concerns as expressed through the comment period is required for this standard to be acceptable. Our region as well as other federal entities have expressed somilar concerns.

Transmission Agency of Northern California - TANC Negative

Transmission Owners

TANC is voting "No" on this Standard for the following two reasons.

First, the definition of Interconnection Reliability Operating Limit includes the following statement --- “A system operating limit which, if exceeded, could lead to instability, uncontrolled separation, or cascading outages that adversely impact the reliability of the bulk transmission system.” This statement seems to imply that it is OK to operate over the established limit if it would not cause cascading, even though it could result in damaging equipment, loss of load, or overloads on another entity’s facilities. We believe that implying that limits are only exceeded if the violation could lead to “instability, uncontrolled separation, or cascading outages” will lead to a degradation of system reliability. For example, a system operator may conclude that it is acceptable to violate an operating limit as long as the consequences are not a cascading outage. We do not believe that this philosophy is acceptable, especially in light of what happened back east on August 14, 2003.

The other reason we are voting "No" is that in the standard, the time allowed for the system to return to safe operating limits following a disturbance (Tv) is a variable whose value is based on the particular limit being violated. This concept is fine. However, there is no upper limit to Tv. The Reliability Authority is responsible for setting Tv, but without a limit on the maximum amount of time allowed to return the system to within its operating limits, some areas could end up setting values of Tv that could put other areas at risk.

Tucson Electric Power Company TEPC Negative

Electric Generators

The comments submitted by WECC need to be resolved prior to approval of this Standard.

United Illuminating UICO Negative

Transmission Owners

UI agrees with NPCC’s position that Tv, the time an IROL can be exceeded without compliance sanctions, be limited to a maximum of 30 minutes as presently stated in NERC Operating Policy 2. The proposed Standard implies that Tv’s may be greater than 30 minutes and may represent an acceptable risk to the North American bulk power system. There is no method or criteria established for determining acceptable risk or impact on reliability identified in the Standard or the associated Q&A. Therefore, it is difficult to support the statement that a response time greater than 30 minutes is acceptable.

The Monetary Sanction Matrix - There is an issue with the inclusion of this monetary sanction matrix and what its implications are. The NPCC CMAS has expressed concern over its inclusion and maintains that the use of market mechanisms where possible, as well as, letters of increasing degrees of severity and notifications to regulatory agencies are more effective in ensuring compliance. UI agrees with this position.

Standard 200 should clearly reflect requirements and measures that require all Reliability Authorities to initiate immediate corrective actions as soon as an Interconnection Reliability Operating Limit (IROL) is exceeded or the system is in an unanalyzed state. It is NPCC’s position that NERC Standards should ensure

mitigating actions are implemented when instability, uncontrolled separation, or cascading outages would occur as a result of a change in one or more operating parameter(s) as soon as the condition exists. UI agrees with NPCC's position.

The Standard does not include clear definitions or criteria on how “local” and “Wide Area Impact” are determined. Therefore, it is difficult to assess what electrical boundaries an IROL is meant to protect. This definition of Wide Area Impact points out that the electrical area to be included in the limit may be larger than the portion of the transmission system under the authority of a single Reliability Authority (RA). This indicates the need for studies and associated limits that transcend the boundaries of a single RA's purview, yet there is no formal statement identifying this need in standard, 200, 600 or the Co-ordinate Operations Standard (currently under development).

United States Bureau of Reclamation Negative

Electric Generators

The Bureau of Reclamation is concerned that the proposed standard as written will be difficult to enforce. The standard also seems to imply that operating over limits would be permitted if it did not negatively impact the reliability of the system. Finally the standard has not been tested in a pilot situation to assess how it may operate in practice. It also appears that more focus is needed on assuring that operators take timely and appropriate actions to correct any violations of operating limits.

Westar Energy Generation & Marketing WRGS Negative

Electric Generators

Does not meet criteria suggested by SWPP ORWG.

Westar Energy Generation & Marketing WRGS Negative

Electricity Brokers, Aggregators, and Marketers

Based on SPP reliability working group recomendations

Westar Energy WR Negative

Transmission Owners

The unlimited Tv allows an entity to set a Tv value “accepting risk” for some period of time, while neighboring entities are also exposed to the risk but are unable to limit the Tv that is defined. A variable Tv with a maximum of 30 minutes or 1 hour would be more acceptable. If more time is needed to resolve loading problems, actions should be started prior to
reaching the IROL.

Westar Energy WR Negative

Load Serving Entities (LSEs)

We feel that there shoud be a specific length of time to correct any violation. If that time is exceed, then penalties should occur. The way the rule is currently written, an entity could be violating a reliability limit for an indefinit length of time with no penalty.

Western Area Power Administration - CM WACM Affirmative

Transmission Owners

1. One of the on-going problems that has existed from region to region, and in some cases, within sub-regions, is the development of a consistent operating limit. While the purpose of this standard is to enforce the observance of those limits, we

feel that there needs to be more proscriptive wording within the standard for the creation to those limits.

2. T sub v needs to be developed with a maximum time limit. All IROLs are significant, by definition, and should not have the latitude of an open ended requirement.

3. There needs to be further development in the definitions of “wide-spread” and “local” impact.

4. It is suggested that this standard be placed through a field test prior to implementation and enforcement. The Operating Limit Definition Task Force has had a field test in place for the last 6 months which yielded zero violation reports. They are in the process of reviewing the reasons for this extreme drop in reporting, and will discuss those findings at the March NERC Operating Committee meeting. I suggest that this standard would benefit in a similar manner.

Western Area Power Administration - UGP Marketing UGPM Affirmative

Electricity Brokers, Aggregators, and Marketers

Western Electricity Coordinating Council Negative

Regional Transmission Organizations (RTOs), Independent System Operators (ISOs), and Regional Reliability Councils

REASONS FOR THE WECC VOTE AGAINST
NERC STANDARD 200 – OPERATE WITHIN INTERCONNECTION RELIABILITY OPERATING LIMITS

We have a number of concerns regarding the standard as written. The following bullets list our major concerns:

• The definition of Interconnection Reliability Operating Limit includes the following statement --- “A system operating limit which, if exceeded, could lead to instability, uncontrolled separation, or cascading outages that adversely impact the reliability of the bulk transmission system.” This seems to imply that it is OK to operate over the established limit if it would not cause cascading, even though it could result in damaging equipment, loss of load, or overloads on another entity’s facilities. We believe that implying that limits are only exceeded if the violation could lead to “instability, uncontrolled separation, or cascading outages” will lead to a degradation of system reliability. For example, a system operator may conclude that it is acceptable to violate an operating limit as long as the consequences are not a cascading outage. This philosophy is not acceptable.

• The proposed standard will be difficult and impractical to enforce. The standard adds an enforcement burden of proof in that one would have to demonstrate that the violation of the limit “could lead to instability, uncontrolled separation, or cascading outages” for the actual operating conditions which existed. As such there may have to be a technical study conducted almost every time a limit is exceeded to assess each reported potential OWL violation to demonstrate the violation would or would not have resulted in cascading for that particular operating point. We do not believe it is practical to expect that a study be run representing the system conditions in effect at the time for each operating limit violation to assess whether the consequences would make the violation reportable.

• The standard focuses too much attention on reporting and documentation rather than focusing on the need for operators to take timely and appropriate actions to correct operating limit violations.

• The standard has not been field-tested. Our experience (with the WECC Reliability Management System – RMS) has demonstrated that much can be learned from field tests to verify that the standard requirements are measurable and enforceable.

Results from analysis of field tests should be used to refine the standard before it is implemented and enforced.

• The definition of “cascading” is inconsistent with NERC definitions found elsewhere. The definition of “wide area impact” is overly broad, stating the area affected is “always larger than the local area monitored by a single transmission operator.” By this definition, the affected area could be large (such as a major metropolitan area or multi-state RTO) and still not be considered a “wide area impact.”

• The document “Questions and Answers About the Operate Within IROLs Standard” states that: “Several things must be in place before entities are expected to come into full compliance with all of the requirements of this standard. Most importantly, the Operate Within IROLs Standard can’t be implemented until after the Determine Facility Ratings, System Operating Limits and Transfer Capabilities standard has been implemented.” However, the Effective Date section on page 3 indicates that “This standard will become effective on the first day of the month following the month that the NERC Board of Trustees adopts the standard.” These two statements appear to contradict each other.

• In our opinion, this standard as written invalidates the ratings, transfer capabilities, and limits established under the draft “Standard 600 – Determine Facility Ratings, System Operating Limits, and Transfer Capabilities” because it only provides for enforcement of “Interconnected Reliability Operating Limits,” which are the limits that, when exceeded, “could lead to instability, uncontrolled separation, or cascading outages that adversely impact the reliability of the bulk transmission system.” The current draft of Standard 600 does not mention “Interconnected Reliability Operating Limits.”

Wisconsin Electric Power Company Negative

Electric Generators

Wisconsin Energy Corporation - PM WEC Negative

Transmission Dependent Utilities

201 IROL Identification
a. Requirements
1. The Reliability Authority shall identify and document which Facilities (or groups of Facilities) in the Reliability Authority’s Reliability Authority Area are subject to Interconnection Reliability Operating Limits.
2. The Reliability Authority shall identify each Interconnection Reliability Operating Limit within the Reliability Authority’s Reliability Authority Area.
i. The Reliability Authority shall identify a Tv for each Interconnection Reliability Operating Limit.

The ability of the RA to both identify and set the Tv for IROL’s lends itself to a natural conflict with the compliance sanctions. The longer the Tv the more time the RA has to act to mitigate the limit violation and avoid a stronger penalty in requirement 204. Suggest that the list of IROL’s and their Tv may be developed by the RA but must be confirmed by the Planning Authority if not the same entity, or the RA’s Regional Reliability Council. For RA’s with dynamic or automated determination of IROL’s and their Tv conformation of the criteria and methodology by the PA if not the same entity or the RA’s RRC. Confirmation by a third party may ensure that the RA will not put the interconnection in undue risk.

204 Actions
a. Requirements
1. The Reliability Authority shall act 1 or direct others to act to:
i. Prevent instances where Interconnection Reliability Operating Limits may be exceeded.
ii. Mitigate the magnitude and duration of instances where

Interconnection Reliability Operating Limits have been exceeded.

Exceeding an IROL is a indicator of a potentially catastrophic event, in addition to the above, the RA should also be required to act by implementing “conservative operations” for conditions that are unknown or not studied and that do not have a defined IROL.

The requirements for either RA’s or TO’s to manage lower level facility operating limits for protecting assets or ensuring reliable operations in local areas have yet to be determined or initiated in the standards process. These “lower level” operating requirements must be defined and implemented concurrent with this standard.

207 Action Plan
a. Requirements
1. The Reliability Authority shall have an action plan that identifies actions it shall take or actions it shall direct others to take, to prevent or mitigate instances of exceeding its Interconnection Reliability Operating Limits.

Exceeding an IROL is a indicator of a potentially catastrophic event, in addition to the above, the RA should also be required to have an action plan for implementing “conservative operations” for conditions that are unknown or not studied and that do not have a defined IROL.

208 Reliability Authority Directives
a. Requirements
1. The Transmission Operator, Balancing Authority, and Interchange Authority shall follow the Reliability Authority’s directives to:
i. Prevent instances where Interconnection Reliability Operating Limits may be exceeded.
ii. Mitigate the magnitude and duration of instances where Interconnection Reliability Operating Limits have been exceeded.
2. The responsible entity shall document the Reliability Authority’s directives and the actions taken.
b. Measures
1. The responsible entity shall follow the Reliability Authority’s directives and shall document the directives and actions taken to meet the directives.
2. The responsible entity shall document via an operations log or other data source, the following for each directive it receives relative to an Interconnection Reliability Operating Limit:
i. Date and time of directive received
ii. Directive issued
iii. Actions taken in response to directive

The RA will have several conditions in which it is required to give operating directives to other functional entities, to require those entities to have specific requirements for documenting RA directives related to IROL is confusing. Suggest all directives issued by the RA shall be documented per these measures.

Wide Area Impact: The impact of an event that, if left untended, could lead to voltage instability,
cascading outages or uncontrolled separation that jeopardizes the reliability of an interconnection.
The geographic size of the area affected by such an event is always larger than the local area
monitored by a single transmission operator and may also be larger than a single Reliability
Authority’s area.

Do not agree that the area must be larger than a single transmission operator.

General comments.

The effective date of the standard should not be before all prerequisites have been met. We agree with requirements 202, 203, 205, 206.

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Wisconsin Public Service Corporation WPS Negative

Load Serving Entities (LSEs)

1) The Tv should have a maximum time limit that coincides with the max value for SOL's.

2) Language is not specific enough to operators about when to begin taking immediate action to rectify the limit violation.

3) Penalty matrix should be based upon the % of line capacity violation versus megawatt exceedence.

4) This standard has not been field-tested. Results from analysis of field tests should be used to refine/verify the standard before it is implemented and enforced.

Xcel Energy Service Inc Negative

Transmission Owners

Back