



DAVID N. COOK
Vice President and General Counsel

NORTH AMERICAN ELECTRIC RELIABILITY COUNCIL

Princeton Forrestal Village, 116-390 Village Boulevard, Princeton, New Jersey 08540-5731

November 28, 2005

Ms. Rae McQuade
President
North American Energy Standards Board
1301 Fannin
Suite 2350
Houston, Texas 77002

Dear Rae:

Decision to Withdraw TLR Procedure Standards Authorization Request

The NERC Operating Committee's Operating Reliability Subcommittee decided, at its November 16–17, 2005 meeting, to withdraw its standards authorization request that proposed to divide the reliability requirements and business practices contained in NERC's current TLR procedure.¹ I am writing to explain why the subcommittee made this decision, and to request that NERC and NAESB work jointly on future revisions and enhancements to the NERC TLR procedure.

It would be good to review some history at this point, because many who read this letter may not know why this decision merits attention.

In 2004, NERC and NAESB were developing in concert their "version 0" reliability standards and business practice standards. During that process, the NERC and NAESB standards drafting teams identified those standards that they agreed were candidates for becoming business practices and others that would become reliability standards. But the drafting teams did not agree on whether or how to divide some of the NERC policies and standards, including the TLR procedure.

To remedy this, the Joint Interface Committee formed a task force of NERC and NAESB representatives who met in August 2004 to review the drafting teams' decisions and sort out the remaining disagreements. The task force decided that, for the time being, NERC and NAESB would both maintain identical TLR procedure language in their "version 0" standards, and that

¹ The currently effective TLR (or transmission loading relief) procedure is contained in NERC Reliability Standard IRO-006-1. The TLR procedure manages the curtailment and reloading of interchange transactions to relieve overloads on transmission facilities.

the two organizations work to separate the reliability rules pertaining to TLR from the related business practices in their “version 1” standards.

NERC and NAESB then formed a joint TLR subcommittee to draft the separate NERC and NAESB standards. The subcommittee finished its work on June 1, 2005 and produced separate draft reliability and business practice standards that the NERC Operating Reliability Subcommittee and NAESB Business Practices Subcommittee, respectively, would sponsor through each organization’s standards development process.

The Operating Reliability Subcommittee submitted a NERC standards authorization request to the NERC standards director on July 14, 2005, and after Standards Authorization Committee approval, NERC posted the SAR on August 3 with a request for public comments due September 2. The posting of the standards authorization request asked a number of questions about whether the reliability standards and business practices had been effectively divided. The comments did not produce a clear consensus on those questions. I have attached a table that summarizes the comments NERC received.

What we believe is most telling are the additional comments that many individuals and groups provided that show a clear concern about splitting the reliability and business practice aspects of TLR into separate standards. I have listed some of these comments below (you will note that some parties repeated other’s comments):

ISO New England — We agree that some aspects of the original IRO-006 are ‘business practices,’ and agree that the completed effort generally meets the original intent of splitting the business practice and reliability components. However, seeing the resulting split, it is clear that these business practices have a direct impact on reliability and we believe they should be maintained within one single standard to prevent confusion and conflicts.

Independent Electricity System Operator (Ontario) — The reliability and business practices within the TLR process are integrated to such an extent that the details need to remain contained within a single document for clarity. Concerns regarding the ability to effectively manage the model and the process with the current proposed split need to be addressed.

Entergy Services, Transmission — The interplay between the business practices and reliability practices associated with TLR is so intimate that the two should not be divided into two standards practices. It would be best for the industry that one TLR standard be developed by the two organizations.

Midwest Reliability Organization — The MRO does not believe there is a reliability need for the proposed standard change. We would contend that the change provides confusion to a very important reliability process. In order to understand the process, the standard and the business practice are necessary.

Northeast Power Coordinating Council CP9 Reliability Standards Working Group

— This proposed standard change was not initiated due to reliability needs. NPCC Participating members believe that the change is in conflict to very important reliability rules. In order to understand the process, the standard and the business practice are necessary.

And

This is an important process that requires a complete understanding of the impact of separating the business practice from the reliability concepts. It is not clear that the current proposed document split will retain the integrity of the TLR process. The potential negative impact of degrading the RC's ability to manage loop flow dictates that any change in documentation and responsibility must proceed carefully.

Southern Company — Transmission — My only concern with the splitting of reliability requirements and business practices is how they will be managed and/or coordinated in the future. I'm not sure what value is added to the reliability of the grid by now having our grid operators manage their respective systems with a NERC manual in one hand and a NAESB manual in the other. Right now the two documents are in synch with one another; however, as we move forward in time, what will be the process for conflict resolution between the two?

The Operating Reliability Subcommittee reviewed the public comments at its November meeting. It also discussed the difficulties it anticipates in keeping the Interchange Distribution Calculator algorithms aligned with the business practices that NAESB might develop and the FERC *pro forma* tariff, which includes the TLR procedure. This is already a very complicated process that requires analysis by the NERC Interchange Distribution Calculator Working Group (which makes certain the TLR algorithms are feasible and writes the vendor change orders), review by the Distribution Factors Working Group (which is responsible for keeping the power flow model in the IDC accurate), and final implementation by NERC's IDC services vendor.

Based on its review of the comments filed, the Operating Reliability Subcommittee concluded that achieving consensus (as defined in NERC's standards development process) on the divided TLR reliability standard was unlikely. The subcommittee further questioned whether splitting the reliability and business practices that are so interrelated would be workable. For these reasons, the subcommittee decided to withdraw its standards authorization request.

It is obvious that NERC and NAESB must work together as custodians of the TLR procedure. NERC has spent years refining the procedure to meet the desires of the marketplace and maintain consistency with the FERC *pro forma* tariff. (Indeed, NERC added a network and native load calculation to the TLR procedure at FERC's request.) Today, few transmission customers participate in the Operating Reliability Subcommittee's discussions. Having continuing NAESB participation will ensure that the transmission customer perspective is fully heard in future

Ms. Rae McQuade
November 28, 2005
Page Four

deliberations on the TRL procedure. Therefore, in lieu of separating the TLR procedure NERC reliability and NAESB business practice standards, I request that our organizations work jointly to maintain the TLR procedure's effectiveness and enhance both reliability and the economics of the marketplace. I am confident we can do this with joint meetings between the Operating Reliability Subcommittee, Interchange Distribution Calculator Working Group, and Business Practices Subcommittee. Then, the ORS and BPS can together submit necessary standards authorization requests for approval through NERC's standards process. Our chances for success will be much better.

Sincerely,

A handwritten signature in black ink that reads "Dan M. Cook". The signature is written in a cursive style with a large, stylized "D" and "M".

Comments — Draft 1 Proposed Reliability Coordination — Transmission Loading Relief IRO-006-1 SAR

If you feel that your comment has been overlooked, please let us know immediately. Our goal is to give every comment serious consideration in this process! If you feel there has been an error or omission, you can contact the Manager of Standards, Mark Ladrow at 609-452-8060 or at mark.ladrow@nerc.net. In addition, there is a NERC Reliability Standards Appeals Process.¹

1. Do you believe there is a reliability need for this proposed standard change? If not, please explain in the comment area.

Commenter	Yes	No	Comment	Response
TOTAL:	6	6		
Southern Company – Transmission Jim Busbin Marc Butts Jim Viikinsalo	X		N/A	
Operating Reliability Working Group (ORWG) Robert Rhodes Dan Boezio Bob Cochran Mike Crouch Todd Fridley Mike Gammon Serhly Kotsan Robert Rhodes	X			
ISO NE Cheryl Mendrala		X	This proposed standard change was not initiated due to reliability needs	
Entergy Services, Transmission Ed Davis Rick Riley Jay Zimmerman George Bartlett James Case Bill Aycock Melinda Montgomery Narinder Saini Maurice Casadaban		X	The interplay between the business practices and reliability practices associated with TLR is so intimate that the two should not be divided into two standards practices. It would be best for the industry that one TLR standard be developed by the two organizations.	
Joint Interchange Scheduling Working Group Bert Gumm Troy Simpson Marilyn Franz Jim Hansen Kathee Downing Jim Eckelcamp Bob Harshbarger Paul Sorenson Bob Schwermann Bonita Smulski	X			

¹ The appeals process is in the Reliability Standards Process Manual: <http://www.nerc.com/standards/newstandardsprocess.html>.

Comments — Draft 1 Proposed Reliability Coordination — Transmission Loading Relief IRO-006-1 SAR

Taryn McPherson Salah Kitali Joel Mickey Andrew Burke				
AEP Raj Rana		X	We support the NERC/NAESB initiative to split the TLR document in order extract the business practice aspects. However, there is no reliability need for this proposed standard change. The reliability need in terms by managing power flow relief in a pre-defined time period in order to maintain security of the system did not change. However, this draft does not provide reliability performance specifications, such as X MW or % of relief in Y minutes. The NERC portion of this standard should specify what is needed to maintain the system security in the interconnected environment, while the NAESB portion should specify the road map as to how to do it.	
Midwest Reliability Organization Alan Boesch Terry Bilke Robert Coish Dennis Florum Todd Gosnell Wayne Guttormson Jim Maenner Tom Mielnik Darrick Moe Ken Goldsmith Joe Knight The 31 Additional MRO Members		X	The MRO does not believe there is a reliability need for the proposed standard change. We would contend that the change provides confusion to a very important reliability process. In order to understand the process the standard and the business practice are necessary.	
Public Service Commission of South Carolina Phil Riley John E. Howard David A. Wright Randy Mitchell Elizabeth B. Fleming G. O'Neal Hamilton Mignon L. Clyburn C. Robert Moseley	X			
Ohio Valley Electric Corp. Scott R. Cunningham	X			
IESO, Ontario Dan Rochester		X	We do not feel there is a reliability need for the proposed standard "change". We would contend that the change provides confusion to a very important reliability process. In order to understand the process the standard and the business practice are necessary.	
Southern Company Generation Roman Carter Joel Dison	X			

Comments — Draft 1 Proposed Reliability Coordination — Transmission Loading Relief IRO-006-1 SAR

Clifford Shepard Lucius Burris Steve Lowe			
CP9 Reliability Standards Working Group Guy Zito Kathleen Goodman Khaqan Khan Vinod (Bob) Kotecha		X	This proposed standard change was not initiated due to reliability needs. NPCC Participating members believe that the change is in conflict to very important reliability rules. In order to understand the process the standard and the business practice are necessary.

Comments — Draft 1 Proposed Reliability Coordination — Transmission Loading Relief IRO-006-1 SAR

2. Do you believe the TLR Subcommittee appropriately divided the elements of TLR business practices vs. TLR reliability requirements? If not, please explain in the comment area.

Commenter	Yes	No	Comment	Response
TOTAL:	5	7		
Southern Company – Transmission Jim Busbin Marc Butts Jim Viikinsalo	X		N/A	
Operating Reliability Working Group (ORWG) Robert Rhodes Dan Boezio Bob Cochran Mike Crouch Todd Fridley Mike Gammon Serhly Kotsan Robert Rhodes		X	We feel that the division between business practices and reliability standards may not have gone far enough. The reliability standards should focus on establishing the criteria for initiation of different TLR levels and the required timeframes for relief. Business practices should focus on how the curtailments are executed to achieve the relief levels in the timeframes required by the reliability standard.	
ISO NE Cheryl Mendrala		X	- Section 2.6 and 2.7 in the original standard defined step-by-step actions the Operator is to take under TLR Levels 5a and 5b. These actions have been removed and currently reside in the proposed NAESB standard. It is not appropriate for a business practice standard to define actions to be taken by a Reliability Coordinator in real-time operations to resolve a reliability issue. The need for a TLR is in response to a problem with reliability on the system. There is no doubt that the Operator must be presented with all the information that is contained in both the proposed NERC and NAESB standards in order to issue that TLR. If the operator does not know what transactions are available in any given category, they do not know what TLR level is needed to resolve the situation. Therefore, we cannot agree with the assertion that the information contained in the NAESB standard does not impact reliability. We agree that some aspects of the original IRO-006 are 'business practices,' and agree that the completed effort generally meets the original intent of splitting the business practice and reliability components. However, seeing the resulting split, it is clear that these business practices have a direct impact on reliability and we believe they should be maintained within one single standard to prevent confusion and conflicts. Also, since the fundamental practice for defining the priorities and treatment of transactions under each TLR level is consistent with the FERC pro-forma tariff, there is minimal subjectivity involved in the business practices that are included in the original NERC standard.	
Entergy Services, Transmission Ed Davis		X	A complete response to this question is inappropriate at this time.	

Comments — Draft 1 Proposed Reliability Coordination — Transmission Loading Relief IRO-006-1 SAR

<p>Rick Riley Jay Zimmerman George Bartlett James Case Bill Aycock Melinda Montgomery Narinder Saini Maurice Casadaban</p>			<p>It appears that IRO-006 will be divided into 3 major documents: NERC TLR reliability standards, NAESB business practices, and the IDC Reference Documentation. The answer to this question will require a detailed comparison of all three documents with respect to the existing IRO-006. We do not have the NAESB document in front of us in order to make that detailed comparison. In addition, it does not appear that a detailed comparison of the three documents has been requested since the SAR request states in the last paragraph that the development effort will begin by assessing for completeness and accuracy the revised Attachment 1.</p>	
<p>Joint Interchange Scheduling Working Group Bert Gumm Troy Simpson Marilyn Franz Jim Hansen Kathee Downing Jim Eckelcamp Bob Harshbarger Paul Sorenson Bob Schwermann Bonita Smulski Taryn McPherson Salah Kitali Joel Mickey Andrew Burke</p>	<p>X</p>			
<p>AEP Raj Rana</p>		<p>X</p>	<p>The two documents are overlapping. Same statements in both documents.</p>	
<p>Midwest Reliability Organization Alan Boesch Terry Bilke Robert Coish Dennis Florom Todd Gosnell Wayne Guttormson Jim Maenner Tom Mielnik Darrick Moe Ken Goldsmith Joe Knight The 31 Additional MRO Members</p>		<p>X</p>	<p>Steps 1.4.1, 1.4.1.1, 1.5, 1.5.1, 1.6, 1.7, 2.1.2, 2.2.2, 2.4.2, 2.5.2, 3.2.1.2, 3.3.1.2, 7.1, are reliability related and should remain in the standard. The dynamic schedule part of 1.6.6 was added to the Standard in June of this year with 100% of the ballot body approval, it should remain as part of this standard.</p>	
<p>Public Service Commission of South Carolina Phil Riley John E. Howard David A. Wright Randy Mitchell</p>	<p>X</p>			

Comments — Draft 1 Proposed Reliability Coordination — Transmission Loading Relief IRO-006-1 SAR

Elizabeth B. Fleming G. O'Neal Hamilton Mignon L. Clyburn C. Robert Moseley				
Ohio Valley Electric Corp. Scott R. Cunningham	X			
IESO, Ontario Dan Rochester		X	The reliability and business practices within the TLR process are integrated to such an extent that the details need to remain contained within a single document for clarity. Concerns regarding the ability to effectively manage the model and the process with the current proposed split need to be addressed. The ability to follow developing market issues must also be retained. Steps 1.4.1, 1.4.1.1, 1.5, 1.5.1, 1.6, 1.7, 2.1.2, 2.2.2, 2.4.2, 2.5.2, 3.2.1.2, 3.3.1.2, 7.1, are reliability related and should remain in the standard. The dynamic schedule part of 1.6.6 was added to the Standard in June of this year with approval of 100% of the ballot body. It should remain as part of this standard.	
Southern Company Generation Roman Carter Joel Dison Clifford Shepard Lucius Burris Steve Lowe	X			
CP9 Reliability Standards Working Group Guy Zito Kathleen Goodman Khaqan Khan Vinod (Bob) Kotecha		X	- Section 2.6 and 2.7 in the original standard defined step-by-step actions the Operator is to take under TLR Levels 5a and 5b. These actions have been removed and currently reside in the proposed NAESB standard. It is not appropriate for a business practice standard to define actions to be taken by a Reliability Coordinator in real-time operations to resolve a reliability issue. The need for a TLR is in response to a problem with reliability on the system. The Operator must be presented with all the information that is contained in both the proposed NERC and NAESB standards in order to issue that TLR. If the operator does not know what transactions are available in any given category, they do not know what TLR level is needed to resolve the situation. NPCC participating members do not agree with the assertion that the information contained in the NAESB standard does not impact reliability. Some aspects of the original IRO-006 are 'business practices,' and that the completed effort generally meets the original intent of splitting the business practice and reliability components. However, seeing the resulting split, it is clear that these business practices have a direct impact on reliability and they should be maintained within one single standard to prevent confusion and conflicts. Also, since the fundamental practice for defining the priorities and treatment of transactions under each TLR level is consistent with the FERC pro-forma tariff, there is minimal subjectivity involved in the business practices that are included in	

Comments — Draft 1 Proposed Reliability Coordination — Transmission Loading Relief IRO-006-1 SAR

		<p>the original NERC standard.</p> <p>Steps 1.4.1, 1.4.1.1, 1.5, 1.5.1, 1.6, 1.7, 2.1.2, 2.2.2, 2.4.2, 2.5.2, 3.2.1.2, 3.3.1.2, 7.1, are reliability related and should remain in the standard. The dynamic schedule part of 1.6.6 was added to the Standard in June of this year with 100% of the ballot body approval, it should remain as part of this standard.</p>	
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Comments — Draft 1 Proposed Reliability Coordination — Transmission Loading Relief IRO-006-1 SAR

3. Do you believe there are still elements of TLR business practices that remain in the proposed TLR reliability requirements? If not, please explain in the comment area.

Commenter	Yes	No	Comment	Response
TOTAL:	4	8		
Southern Company – Transmission Jim Busbin Marc Butts Jim Viikinsalo		X	N/A	
Operating Reliability Working Group (ORWG) Robert Rhodes Dan Boezio Bob Cochran Mike Crouch Todd Fridley Mike Gammon Serhly Kotsan Robert Rhodes	X		Everything in the proposed Attachment 1 - IRO-006-0 from Section 3 to the end of Attachment 1, including Appendices A and B, should be removed from the reliability standard and incorporated into the TLR Business Practices document. This material gets into the internal workings of the tool itself rather than dealing with the overall guiding principle of providing, and maintaining, relief within a specific timeframe.	
ISO NE Cheryl Mendrala		X	See response to question 2.	
Entergy Services, Transmission Ed Davis Rick Riley Jay Zimmerman George Bartlett James Case Bill Aycock Melinda Montgomery Narinder Saini Maurice Casadaban	X		The NERC TLR reliability standard part of this documentation appears to be all reliability related. However, the IDC Reference Document appears to have significant business practice elements contained in it.	
Joint Interchange Scheduling Working Group Bert Gumm Troy Simpson Marilyn Franz Jim Hansen Kathee Downing Jim Eckelcamp Bob Harshbarger Paul Sorenson Bob Schwermann Bonita Smulski Taryn McPherson Salah Kitali Joel Mickey Andrew Burke		X		
AEP Raj Rana	X		We believe that items like firm/non-firm transactions types, TLR levels etc. should be taken out of the reliability portion of this	

Comments — Draft 1 Proposed Reliability Coordination — Transmission Loading Relief IRO-006-1 SAR

			standard. These items should be included in the NAESB portion. The reliability portion should only address the needed relief amount on constrained facilities and the time under which the relief should be provided in order to maintain security of the interconnected network.	
Midwest Reliability Organization Alan Boesch Terry Bilke Robert Coish Dennis Florom Todd Gosnell Wayne Guttormson Jim Maenner Tom Mielnik Darrick Moe Ken Goldsmith Joe Knight The 31 Additional MRO Members		X		
Public Service Commission of South Carolina Phil Riley John E. Howard David A. Wright Randy Mitchell Elizabeth B. Fleming G. O'Neal Hamilton Mignon L. Clyburn C. Robert Moseley		X		
Ohio Valley Electric Corp. Scott R. Cunningham	X		At times, RTO ramp limitations are invoked when TLR curtailments occur. This issue is not covered in the standard, but seems to be related to a business practice, rather than a reliability issue. Perhaps the ramp limitation should be waived or adjusted if the limitation is caused by the curtailments that occur with the TLR.	
IESO, Ontario Dan Rochester		X		
Southern Company Generation Roman Carter Joel Dison Clifford Shepard Lucius Burris Steve Lowe		X		
CP9 Reliability Standards Working Group Guy Zito Kathleen Goodman Khaqan Khan Vinod (Bob) Kotecha		X	See response to question 2.	

Comments — Draft 1 Proposed Reliability Coordination — Transmission Loading Relief IRO-006-1 SAR

4. Do you believe there are still elements of TLR reliability requirements that remain in the proposed TLR business practices? If not, please explain in the comment area.

Commenter	Yes	No	Comment	Response
TOTAL:	4	7		
Southern Company – Transmission Jim Busbin Marc Butts Jim Viikinsalo		X	N/A	
Operating Reliability Working Group (ORWG) Robert Rhodes Dan Boezio Bob Cochran Mike Crouch Todd Fridley Mike Gammon Serhly Kotsan Robert Rhodes	X		Sections 3.2.1, 3.2.1.1 and 3.2.1.2 should be moved to the reliability standard since they deal more with how and why a Level 2 TLR is initiated than with the internal workings of the IDC.	
ISO NE Cheryl Mendrala	X		See response to question 2.	
Entergy Services, Transmission Ed Davis Rick Riley Jay Zimmerman George Bartlett James Case Bill Aycock Melinda Montgomery Narinder Saini Maurice Casadaban		X	We can not answer this question since we do not have the NAESB proposal TLR business practices in this package.	
Joint Interchange Scheduling Working Group Bert Gumm Troy Simpson Marilyn Franz Jim Hansen Kathee Downing Jim Eckelcamp Bob Harshbarger Paul Sorenson Bob Schwermann Bonita Smulski Taryn McPherson Salah Kitali Joel Mickey Andrew Burke		X		
AEP Raj Rana			No comments. The TLR business practices document is not available.	

Comments — Draft 1 Proposed Reliability Coordination — Transmission Loading Relief IRO-006-1 SAR

Midwest Reliability Organization Alan Boesch Terry Bilke Robert Coish Dennis Florum Todd Gosnell Wayne Guttormson Jim Maenner Tom Mielnik Darrick Moe Ken Goldsmith Joe Knight The 31 Additional MRO Members	X		See comments in question 2.	
Public Service Commission of South Carolina Phil Riley John E. Howard David A. Wright Randy Mitchell Elizabeth B. Fleming G. O'Neal Hamilton Mignon L. Clyburn C. Robert Moseley		X		
Ohio Valley Electric Corp. Scott R. Cunningham		X		
IESO, Ontario Dan Rochester		X	See comments in question 2.	
Southern Company Generation Roman Carter Joel Dison Clifford Shepard Lucius Burris Steve Lowe		X		
CP9 Reliability Standards Working Group Guy Zito Kathleen Goodman Khaqan Khan Vinod (Bob) Kotecha	X		See response to question 2.	

Comments — Draft 1 Proposed Reliability Coordination — Transmission Loading Relief IRO-006-1 SAR

5. Do you have any other comments on these proposed changes?

Commenter	Yes	No	Comment	Response
Southern Company – Transmission Jim Busbin Marc Butts Jim Viikinsalo	X		My only concern with the splitting of reliability requirements and business practices is how they will be managed and/or coordinated in the future. I'm not sure what value is added to the reliability of the grid by now having our grid operators manage their respective systems with a NERC manual in one hand and a NAESB manual in the other. Right now the two documents are in synch with one another; however, as we move forward in time, what will be the process for conflict resolution between the two?	
Operating Reliability Working Group (ORWG) Robert Rhodes Dan Boezio Bob Cochran Mike Crouch Todd Fridley Mike Gammon Serhly Kotsan Robert Rhodes	X		Section 1.5.1 of Attachment 1 refers to treatment of Interchange Transactions not in the IDC in accordance with NAESB business practices, but we could not find any reference to this treatment in the TLR business practices.	
ISO NE Cheryl Mendrala	X		<p>Recommend restoring the reference to RCIS tool in 1.4. That reference was eliminated when the old 1.4.1 was removed.</p> <ul style="list-style-type: none"> - The old 1.5.1 was removed. There's a general statement added to 1.2 that says "In addition, a Reliability Coordinator may implement other NERC-approved procedures to request relief to mitigate any other transmission constraints as necessary to preserve the reliability of the system." But, that phrase does not seem to capture the same intent as the previous 1.5.1 wording. - Section 1.5.3 the numbering on this section is very confusing. Suggest the following: <ul style="list-style-type: none"> 1.5.3.1. Causes of questionable IDC results may include: (1) Missing Interchange transactions that are known to contribute to the Constraint, (2) Significant change in transmission system topology, or (3) TDF matrix error. 1.5.3.2 Impacts of questionable IDC results may include: (1) relief that would have no effect on, or aggravate the constraint or (2) that would initiate a constraint elsewhere. 1.5.3.3. If other Reliability Coordinators are involved in the TLR event, all impacted Reliability Coordinators shall be in agreement before any adjustments to the relief request list are made. - Title of Section 2 should be changed to be only "Transmission Loading Relief (TLR) Levels." - Section 3 is missing section 3.1. - Suggest that Section 3.2 include a reference to the fact that transactions submitted after the XX:25 deadline will put on HOLD. 	

Comments — Draft 1 Proposed Reliability Coordination — Transmission Loading Relief IRO-006-1 SAR

		<p>- Are Section 3.3.3 and Section 3.4.3 referring back to the deadline defined in 3.2? If so, that section should be referenced.</p> <p>- Text in 3.3.1.1 and 3.3.2 are referring to the same process for reallocation and should use the same terminology. Suggest 3.3.1.1 text be changed to “At XX:25 a reallocation will be performed for the following hour to maintain the target flow identified for the current hour”.</p> <p>- Text in 3.4.1.1 and 3.4.2 are referring to the same process for reallocation and should use the same terminology. Suggest 3.4.1.1 text be changed to “At XX:25 a reallocation will be performed for the following hour to maintain the target flow identified for the current hour”.</p> <p>- The section notation of Appendix B should be modified. The Section numbering shown in the index is not how the headings are titled in the Sections. Also, Section F and Section G should not be 5.1 and 5.2; they should be at the highest index level.</p> <p>General Comment: There have been changes to the congestion management process over the last few years that involve the use of Market information by the IDC. Any new standards addressing the TLR process and the IDC, whether in NERC or NAESB, should consider addressing the current information available to the IDC and include some mention of that information in that standard development.</p> <p>General Comment: One other practical concern that has not been addressed is the ownership, impact and funding of the IDC tool that automates the ‘business practices’ of implementing a TLR for the Operator. The split of the original NERC IRO-006 should not be adopted until this issue is addressed and resolved.</p>	
<p>Entergy Services, Transmission Ed Davis Rick Riley Jay Zimmerman George Bartlett James Case Bill Aycock Melinda Montgomery Narinder Saini Maurice Casadaban</p>	<p>X</p>	<p>The SAR contains the statement that the urgent action revision to Attachment 1 addressing dynamic schedules will be incorporated into the NAESB business practices. We suggest starting with IRO-006-1, rather than with IRO-006-0. Please delete all references to IRO-006-0 (and IRO-006-1) in headers, footers, titles, etc. This new document will result in a new version of IRO--006. This current draft is not version 0 or 1. Please delete all references to adoption by the NERC Board of Trustees, Effective Date, and all dates because the document we are viewing has not been adopted by the BOT and does not have an Effective Date.</p> <p>Please provide a redline version showing the draft changes to IRO-006-1. This redline would make review and comment much easier for commenters.</p> <p>We appreciate the development of the matrix and would probably find it useful for keeping track of the disposition of each requirement in the original IRO-006. However, in its current form we do not understand which columns relate to which documents and the row designations are not clearly understood.</p>	
<p>Joint Interchange Scheduling</p>	<p>X</p>	<p>1. We request that the scope of this SAR be expanded to</p>	

Comments — Draft 1 Proposed Reliability Coordination — Transmission Loading Relief IRO-006-1 SAR

<p>Working Group Bert Gumm Troy Simpson Marilyn Franz Jim Hansen Kathee Downing Jim Eckelcamp Bob Harshbarger Paul Sorenson Bob Schwermann Bonita Smulski Taryn McPherson Salah Kitani Joel Mickey Andrew Burke</p>		<p>include resolving the reloading of curtailed transactions above their reliability limit by an entity other than the initiating entity or above any pre-existing reliability or market profiles. 2. We also request that the scope of the SAR be expanded to include standards for when curtailments may be denied and when curtailments may be issued. 1 - There have been several instances where a curtailment has been issued and then been automatically or manually reloaded above the reliability limit. The automatic reload problem created by the IDC has been resolved by CO-148, automatic reload by other back office applications has not been corrected, nor have manual adjustments. There are several options available for correcting this problem. This should be addressed by specifying requirements and performance measures in the TLR standard and may also be addressed through NAESB business practices and modifications to the e-Tag specification. Also, any pre-existing curtailment levels are lost. JISWG recommends that the entity who has issued the curtailment be the only entity able to authorize the reload. When the reload occurs the energy profile should be limited to the next lowest reliability limit or market adjustment profile. 2- Under normal circumstances, a curtailment (issued for reliability reasons) should not be denied. However, there are some limited circumstances where a curtailment should be denied. For example, if a curtailment comes in and the generator cannot meet the ramp requirements, then the curtailment could be denied and would be reissued for the next scheduling interval. This ensures that the tags reflect actual conditions. In other cases, curtailments are sometimes issued when PSE's cannot make their market level adjustments prior to cutoff. The TLR standard should address those specific reasons for denying a curtailment. Reliability is compromised when curtailments are denied for non-reliability reasons. Reliability may also be compromised when curtailments are issued for non-reliability reasons. If scope of the SAR is adjusted, JISWG volunteers to assist the drafting team with providing specific language for the TLR standard addressing these issues.</p>	
<p>AEP Raj Rana</p>	<p>X</p>	<p>Use of proxy flowgates by the reliability coordinators must be prohibited. This practice must be explicitly addressed in this standard because, the use of proxy flowgates not only will result in mis-allocation of corrective actions, but at worst could even result in actions being taken that actually increase flows on the limiting element, instead of decreasing them.</p>	
<p>Midwest Reliability Organization Alan Boesch Terry Bilke Robert Coish Dennis Florom Todd Gosnell</p>	<p>X</p>	<p>It was very difficult to review the changes to the standard without a redline copy. In order to perform our review we made a redline of the original standard. The MRO does not support this modification. The proposed change provides confusion to a very important reliability process. Also the proposed standard references a NAESB standard which is inconsistent with the</p>	

Comments — Draft 1 Proposed Reliability Coordination — Transmission Loading Relief IRO-006-1 SAR

<p>Wayne Guttormson Jim Maenner Tom Mielnik Darrick Moe Ken Goldsmith Joe Knight The 31 Additional MRO Members</p>			<p>NERC Standards Process Manual which says "All mandatory requirements of a reliability standard shall be within an element of the standard. Supporting documents to aid in the implementation of a standard may be referenced by the standard but are not part of the standard itself." There are mandatory parts of the proposed standard in the NAESB business practice and are necessary for the successful implementation of this reliability standard. With the two documents being modified by separate entities there is a good chance that the documents will not be coordinated and kept in synchronization when changes are made.</p>	
<p>Public Service Commission of South Carolina Phil Riley John E. Howard David A. Wright Randy Mitchell Elizabeth B. Fleming G. O'Neal Hamilton Mignon L. Clyburn C. Robert Moseley</p>		<p>X</p>		
<p>Ohio Valley Electric Corp. Scott R. Cunningham</p>	<p>X</p>		<p>The use of proxy flowgates is not mentioned at all in the proposed standard. The use of proxy flowgates should not be allowed, except in very unusual circumstances. If use of a proxy flowgate is necessary, such use should be justified and approval from all affected parties should be obtained.</p>	
<p>IESO, Ontario Dan Rochester</p>	<p>X</p>		<p>The IESO does not fully support the modifications proposed in this SAR. The proposed change provides confusion to a very important reliability process. Also the proposed standard references a NAESB standard which is inconsistent with the NERC Standards Process Manual which says "All mandatory requirements of a reliability standard shall be within an element of the standard. Supporting documents to aid in the implementation of a standard may be referenced by the standard but are not part of the standard itself." There are mandatory parts of the proposed standard in the NAESB business practice that are necessary for the successful implementation of this reliability standard. With the two documents being modified by separate entities there is a good chance that the documents will not be coordinated and kept in synchronization when changes are made. As acknowledged by the TLR Subcommittee that worked to create this proposed split, the business practices and reliability aspects of TLR are very intertwined. In effect, the information in both the proposed NERC and NAESB standard must be simultaneously available to the Operators in the Control Room, in order for them to operate the system reliably. While the effort to create this initial split in the TLR standards has been completed, consideration should be given as to how this split will</p>	

Comments — Draft 1 Proposed Reliability Coordination — Transmission Loading Relief IRO-006-1 SAR

			<p>be maintained, if going forward, before it is adopted by the industry. Operator training issues, as well as the ownership and funding of the IDC tool should be considered in this evaluation before such a significant step is taken on a standard that is fundamental to the reliability of the Eastern Interconnection. This is an important process that requires a complete understanding of the impact of separating the business practice from the reliability concepts. It is not clear that the current proposed document split will retain the integrity of the TLR process. The potential negative impact of degrading the RC's ability to manage loop flow dictates that any change in documentation and responsibility must proceed carefully.</p>	
<p>Southern Company Generation Roman Carter Joel Dison Clifford Shepard Lucius Burris Steve Lowe</p>	X		<p>As NAESB and NERC standards are approved and implemented which require close coordination between the two organizations, the need for a common "Operations Manual" may become necessary for System Operators.</p>	
<p>CP9 Reliability Standards Working Group Guy Zito Kathleen Goodman Khaqan Khan Vinod (Bob) Kotecha</p>	X		<p>This is an important process that requires a complete understanding of the impact of separating the business practice from the reliability concepts. It is not clear that the current proposed document split will retain the integrity of the TLR process. The potential negative impact of degrading the RC's ability to manage loop flow dictates that any change in documentation and responsibility must proceed carefully. NPCC participating Members believe the proposed change provides confusion to a very important reliability process. There are mandatory parts of the proposed standard in the NAESB business practice that are necessary for the successful implementation of this reliability standard. With the two documents being modified by separate entities there is a good chance that the documents will not be coordinated and kept in synchronization when changes are made.</p> <p>Recommend restoring the reference to RCIS tool in 1.4. That reference was eliminated when the old 1.4.1 was removed.</p> <ul style="list-style-type: none"> - The old 1.5.1 was removed. There's a general statement added to 1.2 that says "In addition, a Reliability Coordinator may implement other NERC-approved procedures to request relief to mitigate any other transmission constraints as necessary to preserve the reliability of the system." But, that phrase does not seem to capture the same intent as the previous 1.5.1 wording. - Section 1.5.3 the numbering on this section is very confusing. Suggest the following: <p>1.5.3.1. Causes of questionable IDC results may include: (1) Missing Interchange transactions that are known to contribute to the Constraint, (2) Significant change in transmission system topology, or (3) TDF matrix error.</p> <p>1.5.3.2 Impacts of questionable IDC results may include: (1)</p>	

Comments — Draft 1 Proposed Reliability Coordination — Transmission Loading Relief IRO-006-1 SAR

		<p>relief that would have no effect on, or aggravate the constraint or (2) that would initiate a constraint elsewhere.</p> <p>1.5.3.3. If other Reliability Coordinators are involved in the TLR event, all impacted Reliability Coordinators shall be in agreement before any adjustments to the relief request list are made.</p> <ul style="list-style-type: none">- Title of Section 2 should be changed to be only "Transmission Loading Relief (TLR) Levels."- Section 3 is missing section 3.1.- Suggest that Section 3.2 include a reference to the fact that transactions submitted after the XX:25 deadline will put on HOLD.- Are Section 3.3.3 and Section 3.4.3 referring back to the deadline defined in 3.2? If so, that section should be referenced.- Text in 3.3.1.1 and 3.3.2 are referring to the same process for reallocation and should use the same terminology. Suggest 3.3.1.1 text be changed to "At XX:25 a reallocation will be performed for the following hour to maintain the target flow identified for the current hour".- Text in 3.4.1.1 and 3.4.2 are referring to the same process for reallocation and should use the same terminology. Suggest 3.4.1.1 text be changed to "At XX:25 a reallocation will be performed for the following hour to maintain the target flow identified for the current hour".- The section notation of Appendix B should be modified. The Section numbering shown in the index is not how the headings are titled in the Sections. Also, Section F and Section G should not be 5.1 and 5.2; they should be at the highest index level. <p>General Comment: There have been changes to the congestion management process over the last few years that involve the use of Market information by the IDC. Any new standards addressing the TLR process and the IDC, whether in NERC or NAESB, should consider addressing the current information available to the IDC and include some mention of that information in that standard development. In addition, Operator training issues, as well as the ownership and funding of the IDC tool should be considered in this evaluation before such a significant step is taken on a standard that is fundamental to the reliability of the Eastern Interconnection.</p> <p>General Comment: One other practical concern that has not been addressed is the ownership, impact and funding of the IDC tool that automates the 'business practices' of implementing a TLR for the Operator. The split of the original NERC IRO-006 should not be adopted until this issue is addressed and resolved.</p>	
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