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September 9, 2008

Mr. Thomas J. Vandervort
NERC JISWG Secretary
North American Electric Reliability Corporation
116-390 Village Blvd.
Princeton, NJ 08540

Dear Mr. Vandervort:

Re: IESO Comments on Options for Providing the Capability
in the E-Tag System for Supporting Multiple Reliability Limits

The IESO appreciates the opportunity to comment on the subject proposal.

The IESO generally supports the concept of enhancing reliability by inclusion of additional system limitations that may affect transmission service reservations and subsequent implementation of Interchange Transactions. Specific to the questions asked in the proposal, we offer the following comments:

1. We agree that reliability entities whose limits are shown on an e-Tag must maintain control over the limits they have set. Further, any reliability entity may set different limits on different physical segments that they are associated with to reflect different generation or transmission constraints (or restoration). The proposal calls for "… the Authority service maintain a separate reliability profile. Only the entity issuing the reliability limit may modify it (with the exception of ATF DYNAMIC adjustments)." We are not clear on how this process may be implemented.

   If the proposed approach is for the Transmission Service Provider to create and maintain this profile based on inputs from the reliability entities such as TOPs and RCs, then the process would work. Otherwise, the process may not work since neither the TOPs nor the RCs receive tags during the Arrange stage. The RCs will be able to view tag information after an Interchange Transaction becomes an Interchange Schedule.

2. We are not clear on the intent of the question: "Should the RC be given the capability of modifying (or eliminating) limits set by other reliability entities?" Does it mean a process that will allow an RC to make changes to a limit on a tag, or does it mean an RC to override the limits set by others on the same transmission segment by other process? If it is the former, the RC does not receive tag information and hence is unable to make any changes. If it is the latter, RCs and TOPs that monitor a transmission facility or path are required by NERC standards to observe the lowest value of multiple limits on that facility or path. We thus do not see the need for any modification for so long as the Transmission Service

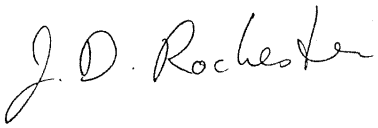
Provider selects the lowest value on a particular segment that has multiple limits provided by more than one reliability entity.

3. We do not have any additional features to suggest.

4. On the final question, the IESO supports active approval on reliability adjustments or limit clearing, regardless of their impacts on the composite reliability profile.

Thank you for your attention to our comments.

Yours truly,



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