

**Initial Ballot Comments — Project for IROL Standard — IRO-010-1**

| <b>Entity</b>                   | <b>Segment</b> | <b>Vote</b> | <b>Comment</b>  |
|---------------------------------|----------------|-------------|---|
| American Electric Power         | 1              | Negative    | AEP votes No. this proposed Standard calls for the Reliability Coordinator to specify the real-time data and information they require to support real-time monitoring, operational planning analyses, and real-time assessments without restriction. This allows for the Reliability Coordinator to ask for the addition of a significant amount of SCADA installations at the expense of the transmission owners in transmission areas that are not pertinent to the purpose of IRO-010-1 which is preventing the instability, uncontrolled separation, or cascading outages that adversely impact the reliability of the interconnection. The Standard should tie the specification of data and information requirements solely to the needs for monitoring and analyzing the control of IROLs.   |
| Bonneville Power Administration | 1              | Negative    | We do not believe that the IRO-010-1 C.M3 has text that is sufficient to be able to know what is adequate to confirm that we provided data, particularly data such as continually updated ICCP data used for situational awareness and using on-line reliability tools.   |
| Duke Energy Carolina            | 1              | Negative    | Duke Energy appreciates the opportunity to vote and comment on this proposed Standard. IRO-010-1 Requirement R3 requires that "Each Balancing Authority, Generator Owner, Generator Operator, Interchange Authority, Load-serving Entity, Reliability Coordinator, Transmission Operator and Transmission Owner shall provide data and information, as specified, to the Reliability Coordinator(s) with which it has a reliability relationship". We are unsure what the phrase "with which it has a reliability relationship" means. IRO-008-1, IRO-009-1 and IRO-010-1 all introduce new terms that are not defined in the NERC Glossary. "Operations Planning", "Same Day Operations" and "Real-time Operations" are used to identify time horizons for requirements.   |
| FirstEnergy Energy Delivery     | 1              | Affirmative | <p>FirstEnergy Corp. appreciates the hard work of the Standard Drafting Team on the challenging task of reorganizing and enhancing the verbiage of the IROL requirements. We vote AFFIRMATIVE to standard IRO-010-1 and ask that the SDT consider our enclosed comments. Comments on EOP-001, IRO-002, IRO-004, IRO-005, TOP-003, TOP-005, and TOP-006: General</p> <ul style="list-style-type: none"> <li>- The Violation Risk Factors should be added to the text of all of the standards. IRO-004 - VSL table shows "R7" instead of "R1" IRO-005 - Several Measures reference the incorrect requirement numbers TOP-003 - R4</li> <li>- There is no measure associated with this requirement - Measures do not include evidence of "planning" of scheduled outages per the requirements - VSL for R3 and R4 are incorrect and reference the wrong entity per the requirements</li> </ul> |
| Great River Energy              | 1              | Negative    | IRO-010 does a good job of stating the requirements of the Reliability Coordinator. However, the standard gives the appearance of having taken away the TOP and BA ability to obtain study data from the RC unless they are specifically involved with the mitigation of an IROL. It is GRE's opinion that entities should be able to obtain data from the Reliability Coordinator upon request as they are able to now. GRE understands that the Reliability Coordinator's responsibility to share data was moved in part to IRO-008-1_R3. The new requirement however does not make is sufficiently transparent that the TOP and BA can request the Assessment results if they choose.  |

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| Hydro One Networks, Inc. | 1 | Affirmative | Hydro One Networks is casting an affirmative vote on the IRO-010 Standard. However, we believe that Requirement R3. should be modified at the earliest possible time when the standard is revised. Requirement R3. must be clear that when referring to data specifications it is within the parameters specified in Requirement R1. Consequently, R3 should read: R3. Each Balancing Authority, Generator Owner, Generator Operator, Interchange Authority, Load-serving Entity, Reliability Coordinator, Transmission Operator, and Transmission Owner shall provide data and information, as specified in R1, to the Reliability Coordinator(s) with which it has a reliability relationship.  |
| Minnesota Power, Inc.    | 1 | Negative    | <p>1. On page 10 of 23 of the redlined "Implementation Plan for Operate Within Interconnection Reliability Operating Limits Standards", the already approved standard requirements are IRO-004-1 R4 &amp; R5 and IRO-005-2 R2 while the proposed replacement requirements are IRO-010-1 R1, R2, &amp; R3 and IRO-008-1 R3. Minnesota Power's comment to IRO-010-1 R1, R2, &amp; R3 and IRO-008-1 R3 is, "The SDT has taken away the ability of entities to obtain study data from the RC unless entities are specifically expected to take actions for an IROL. The current standard says that we may obtain this data upon request at any time. Entities should be allowed to obtain data from the RC upon request as they have now."</p> <p>2. On page 18 of 23 of the redlined "Implementation Plan for Operate Within Interconnection Reliability Operating Limits Standards", the already approved standard requirement is TOP-003-0 R1 while the proposed replacement requirements are IRO-010-1 R1, R2, &amp; R3. Minnesota Power's comment is, "Minnesota Power believes TOP-003-0 should remain as it stands. Having the requirement to report outage data to the RC in two places is better than not having it in TOP-003-0. Having it listed as a data requirement only and not in the standard does not make it clearer."</p> <p>3. On page 19 of 23 of the redlined "Implementation Plan for Operate Within Interconnection Reliability Operating Limits Standards", the already approved standard requirement is TOP-005-0 R1 while the proposed replacement requirement is IRO-010-1 R1. Minnesota Power's comment is, "Interchange transaction data should be added to the new IRO-010-1 R1."</p> <p>4. On page 20 of 23 of the redlined "Implementation Plan for Operate Within Interconnection Reliability Operating Limits Standards", the already approved standard requirement is TOP-005-1 Attachment 1-TOP-005-0 Electric System Data Reliability Data while the proposed replacement requirement is IRO-010-1 R3. Minnesota Power's comment is, "Agree — Data requirements will be more detailed in new standard. However, RC should still be required to share this data with the TOs and BAs. This information should not be lost from this requirement by removing the RC from TOP-005-1 attachment 1"</p> <p>5. On page 22 of 23 of the redlined "Implementation Plan for Operate Within Interconnection Reliability Operating Limits Standards", the already approved standard requirement is TOP-006-1 R4 while the proposed replacement requirement is IRO-010-1 R1 R2, &amp; R3. Minnesota Power's comment to TOP-006-1 R4 is, Minnesota Power don't agree with removing reliability coordinator from the requirement.</p> <p>–Including the Reliability Coordinator in the statement that the RC, TO &amp; BAs shall have information including weather forecasts and past load patterns available to predict near-term load patterns provides</p> |

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|                                     |   |             | clarity.”   |
| National Grid                       | 1 | Affirmative | National Grid agrees with the comments suggested by NPCC with regard to Requirement R3. We suggest that the wording be revised at a later date to include a reference to Requirement R1. The suggested wording is as follows:<br><br>“R3. Each Balancing Authority, Generator Owner, Generator Operator, Interchange Authority, Load-serving Entity, Reliability Coordinator, Transmission Operator, and Transmission Owner shall provide data and information, as specified in R1, to the Reliability Coordinator(s) with which it has a reliability relationship. (Violation Risk Factor: Medium) (Time Horizon: Operations Planning; Same-day Operations; Real-time Operations).”  |
| Northeast Utilities                 | 1 | Affirmative | Insert in R3, "as specified in R1," after "... shall provide data and information, ...".  |
| Bonneville Power Administration     | 3 | Negative    | BPA does not believe that the IRO-010-1 C.M3 has text that is sufficient to be able to know what is adequate to confirm that we provided data, particularly data such as continually updated ICCP data used for situational awareness and using on-line reliability tools   |
| Consolidated Edison Co. of New York | 3 | Affirmative | R3 may be revised at a later date to include a reference to R1 as follows: “R3. Each Balancing Authority, Generator Owner, Generator Operator, Interchange Authority, Load-serving Entity, Reliability Coordinator, Transmission Operator, and Transmission Owner shall provide data and information, as specified in R1, to the Reliability Coordinator(s) with which it has a reliability relationship. (Violation Risk Factor: Medium) (Time Horizon: Operations Planning; Same-day Operations; Real-time Operations)”   |
| FirstEnergy Solutions               | 3 | Affirmative | FirstEnergy Corp. appreciates the hard work of the Standard Drafting Team on the challenging task of reorganizing and enhancing the verbiage of the IROL requirements. We vote AFFIRMATIVE to standard IRO-010-1 and ask that the SDT consider our enclosed comments. Comments on EOP-001, IRO-002, IRO-004, IRO-005, TOP-003, TOP-005, and TOP-006: General<br><br>–“The Violation Risk Factors should be added to the text of all of the standards. IRO-004 - VSL table shows “R7” instead of “R1” IRO-005 - Several Measures reference the incorrect requirement numbers TOP-003 - R4<br>– There is no measure associated with this requirement - Measures do not include evidence of “planning” of scheduled outages per the requirements - VSL for R3 and R4 are incorrect and reference the wrong entity per the requirements |
| Hydro One Networks, Inc.            | 3 | Affirmative | Hydro One Networks is casting an affirmative vote on the IRO-010 Standard. However, we believe that Requirement R3. should be modified at the earliest possible time when the standard is revised. Requirement R3. must be clear that when referring to data specifications it is within the parameters specified in Requirement R1. Consequently, R3 should read: R3. Each Balancing Authority, Generator Owner, Generator Operator, Interchange Authority, Load-serving Entity, Reliability Coordinator, Transmission Operator, and Transmission Owner shall provide data and information, as specified in R1, to the Reliability Coordinator(s) with which it has a reliability relationship.  |
| Lincoln Electric System             | 3 | Negative    | Comments: IRO-010-1 R1, R2, & R3 and IRO-008-1. The Standard Drafting Team has taken away the ability of entities to obtain study data from the RC unless entities area specifically expected to take actions for an IROL. The current standard says that we may obtain this data upon request at any time. Entities should be allowed to obtain data from the RC upon request as they have now. LES believes TOP-003-0   |

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|                                     |   |             | should remain as it stands. Having the requirement to report outage data to the RC in two places is better than not having it in TOP-003-0. Having it listed as a data requirement only and not in the standard does not make it clearer. LES believes that the Interchange transaction data should be added to the new IRO-010-1 R1. LES believes that the data requirements will be more detailed in new standard. However, RC should still be required to share this data with the TO's and BA's. This information should not be lost from this requirement by removing the RC from TOP-005-1 attachment 1. LES does agree with removing Reliability Coordinator from the requirement. - Including the Reliability Coordinator in the statement that the RC, TO & BA's shall have information including weather forecasts and past load patterns available to predict near-term load patterns provides clarity. |
| MidAmerican Energy Co.              | 3 | Negative    | Interchange transaction data should be added to the standard. Reliability Coordinator should still be required to share reliability data with TOs and BAs.   |
| Alliant Energy Corp. Services, Inc. | 4 | Negative    | Entities should be able to obtain study data upon request to the RC, rather than when expected to take action for an IROL.   |
| AEP Service Corp.                   | 5 | Negative    | AEP suggests that this standard tie the specification of data and information requirements solely to the needs for monitoring and analyzing the control of IROLs.  |
| FirstEnergy Solutions               | 5 | Affirmative | <p>FirstEnergy Corp. appreciates the hard work of the Standard Drafting Team on the challenging task of reorganizing and enhancing the verbiage of the IROL requirements. We vote AFFIRMATIVE to standard IRO-010-1 and ask that the SDT consider our enclosed comments. Comments on EOP-001, IRO-002, IRO-004, IRO-005, TOP-003, TOP-005, and TOP-006: General</p> <p>–The Violation Risk Factors should be added to the text of all of the standards. IRO-004 - VSL table shows "R7" instead of "R1" IRO-005 - Several Measures reference the incorrect requirement numbers TOP-003 - R4</p> <p>– There is no measure associated with this requirement - Measures do not include evidence of "planning" of scheduled outages per the requirements - VSL for R3 and R4 are incorrect and reference the wrong entity per the requirements</p>  |
| Lincoln Electric System             | 5 | Negative    | IRO-010-1 R1, R2, & R3. The Standard Drafting Team has taken away the ability of entities to obtain study data from the RC unless entities are specifically expected to take actions for an IROL. The current standard says that we may obtain this data upon request at any time. Entities should be allowed to obtain data from the RC upon request as they have now.  |
| AEP Marketing                       | 6 | Negative    | AEP suggests that IRO-010-1 tie the specification of data and information requirements solely to the needs for monitoring and analyzing the control of IROLs.  |
| Bonneville Power Administration     | 6 | Negative    | We do not believe that the IRO-010-1 C.M3 has text that is sufficient to be able to know what is adequate to confirm that we provided data, particularly data such as continually updated ICCP data used for situational awareness and using on-line reliability tools.  |
| Entergy Services, Inc.              | 6 | Affirmative | Agree with the content changes, however the format of the Requirements deleted in other standards has resulted in a reassignment of Requirement numbering and thus created an undesirable administrative/logistical situation of entities having to revise associations with Requirement numbers to Requirement verbiage. This also applies to NERC processes as well since, for example, a reference "R2" in an RSAW or a matrix may now be skewed and really be "R1 or R3" if a Requirement was deleted or added.  |
| FirstEnergy                         | 6 | Affirmative | FirstEnergy Corp. appreciates the hard work of the Standard Drafting Team on the challenging task of   |

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| Solutions                        |    |          | <p>reorganizing and enhancing the verbiage of the IROL requirements. We vote AFFIRMATIVE to standard IRO-010-1 and ask that the SDT consider our enclosed comments. Comments on EOP-001, IRO-002, IRO-004, IRO-005, TOP-003, TOP-005, and TOP-006: General</p> <ul style="list-style-type: none"> <li>- The Violation Risk Factors should be added to the text of all of the standards. IRO-004 - VSL table shows "R7" instead of "R1" IRO-005 - Several Measures reference the incorrect requirement numbers TOP-003 - R4</li> <li>- There is no measure associated with this requirement - Measures do not include evidence of "planning" of scheduled outages per the requirements - VSL for R3 and R4 are incorrect and reference the wrong entity per the requirements</li> </ul>   |
| Lincoln Electric System          | 6  | Negative | <p>IRO-010-1 R1, R2, &amp; R3 and IRO-008-1. The Standard Drafting Team has taken away the ability of entities to obtain study data from the RC unless entities area specifically expected to take actions for an IROL. The current standard says that we may obtain this data upon request at any time. Entities should be allowed to obtain data from the RC upon request as they have now. LES believes TOP-003-0 should remain as it stands. Having the requirement to report outage data to the RC in two places is better than not having it in TOP-003-0. Having it listed as a data requirement only and not in the standard does not make it clearer. LES believes that the Interchange transaction data should be added to the new IRO-010-1 R1. LES believes that the data requirements will be more detailed in new standard. However, RC should still be required to share this data with the TO's and BA's. This information should not be lost from this requirement by removing the RC from TOP-005-1 attachment 1. LES does agree with removing Reliability Coordinator from the requirement. - Including the Reliability Coordinator in the statement that the RC, TO &amp; BA's shall have information including weather forecasts and past load patterns available to predict near-term load patterns provides clarity.</p>                              |
| Midwest Reliability Organization | 10 | Negative | <p>For the MRO comments: IRO-010-1 R1, R2, &amp; R3 and IRO-008-1, the SDT have taken away the ability of entities to obtain study data from the RC unless entities area specifically expected to take actions for an IROL. The current standard says that we may obtain this data upon request at any time. Entities should be allowed to obtain data from the RC upon request as they have now. The MRO believes TOP-003-0 should remain as it stands. Having the requirement to report outage data to the RC in two places is better than not having it in TOP-003-0. Having it listed as a data requirement only and not in the standard does not make it clearer. The MRO believes that the Interchange transaction data should be added to the new IRO-010-1 R1. The MRO believes that the data requirements will be more detailed in this new standard; however, RC should still be required to share this data with the TO's and BA's. This information should not be lost from this requirement by removing the RC from TOP-005-1 attachment 1. The MRO does not agree with removing Reliability Coordinator from the requirement. - Including the Reliability Coordinator in the statement that the RC, TO &amp; BA's shall have information including weather forecasts and past load patterns available to predict near-term load patterns provides clarity.</p> |