

## **Monitor and Assess Short-term Transmission Reliability — Operate within Interconnection Reliability Operating Limits Standard**

### **Background**

The Monitor and Assess Short-term Transmission Reliability — Operate within Interconnection Reliability Operating Limits Standard was posted for a second public comment period from July 1 through August 29, 2003. The SDT asked industry participants to provide feedback on the revisions made to the standard through a special SAR Comment Form. There were 40 sets of comments, including comments from more than 150 different people, submitted via this special Standard Comment Form. The comments can be viewed in their original format at:

<http://www.nerc.com/~filez/sar-approved.html>

The SDT made changes to the definitions and the standard based on the comments submitted by industry participants. The changes the SDT made to the definitions and the language within the standard are highlighted in the first sections of this document. The SDT's consideration of comments is provided in yellow highlighted text immediately under each question.

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 Director of Standards, Tim Gallagher at 609-452-8060 or at [tim.Gallagher@nerc.com](mailto:tim.Gallagher@nerc.com).

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### Changes to Definitions (Note that changes are shown in blue text.)

**Balancing Authority:** Integrates resource plans ahead of time, and maintains load-interchange-generation balance within its metered boundary and supports system frequency in real time.

**Bulk Electric System:** A term commonly applied to the portion of an electric utility system that encompasses the electrical generation resources and bulk transmission system.

**Cascading Outages:** The uncontrolled successive loss of system elements triggered by an incident at any location. Cascading results in widespread service interruption, which cannot be restrained from sequentially spreading beyond an area predetermined by appropriate studies.

~~**Documentable Interconnection Reliability Operating Limit Violation:** An instance of exceeding an interconnection reliability operating limit for any length of time.~~

**Generator Operator:** Operates generating unit(s) and performs the functions of supplying energy and Interconnected Operations Services.

**Generator Owner:** The entity that owns the generator.

**Instability:** The inability of the transmission system to maintain a state of equilibrium during normal and abnormal system conditions or disturbances.

**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. ~~The reliability authority must log each case of exceeding an interconnection reliability operating limit, and must report (to its compliance monitor) each case of exceeding an interconnection reliability operating limit for a time greater than or equal to  $T_v$ . Note that  $T_v$  may be zero.~~

**Interconnection Reliability Operating Limit Event:** An instance of exceeding an interconnection reliability operating limit for any length of time.

**Interconnection Reliability Operating Limit Event Duration:** The length of time an interconnection reliability operating limit is exceeded. The duration is measured from the point where the limit is first exceeded and ends when the value drops below the limit and remains below the limit for at least 30 seconds.

~~**Interconnection Reliability Operating Limit Violation:** An instance of exceeding an interconnection reliability operating limit for time greater than or equal to  $T_v$ .~~

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**Load-serving Entity:** Secures energy and transmission (and related generation services) to serve the end user.

**Occurrence period (Performance-reset Period):** The time period in which performance is measured, evaluated, and then reset.

**Operational Planning Analysis:** An analysis of the expected system conditions, given the **peak** load forecast(s); and known system constraints, some examples being transmission facility outages, generator outages and equipment limitations. ~~The analysis should ensure that no interconnection reliability operating limits will be exceeded during expected normal operation. An operational planning analysis is done up to seven days ahead of the expected conditions.~~

**Real-time:** ~~Immediate~~ Present time as opposed to future time.

**Real-time Assessment:** An ~~evaluation~~ examination of existing and expected system conditions, conducted by collecting and reviewing immediately available data. ~~to determine the status of the electric system. The reliability authority uses real-time data to conduct its real-time~~

**Real-time Data:** Real-time measured values, state estimator values derived from the measured values, or other calculated values derived from the measured values – may include directly monitored data, Inter-utility data exchange (e.g., Interconnection Control Area Communication Protocol or SCADA Data), and manually collected data.

**Real-time Monitoring:** ~~To use vision and hearing to scan various real-time sources~~ The act of scanning data and drawing conclusions about what the data indicates. ~~Having the ability to scan real-time data as conditions dictate.~~

**Reliability Authority:** Ensures the reliability of the bulk power transmission system within its Reliability Authority Area.

**Reliability Authority Area:** ~~A defined electrical system bounded by interconnection (tie-line) metering and telemetry under the control of a single reliability authority.~~

The collection of generation, transmission, and loads within the boundaries of the organization performing the reliability authority function. Its boundary coincides with one or more balancing authority areas.

**Reportable Interconnection Reliability Operating Limit Violation:** ~~An instance of exceeding an interconnection reliability operating limit for time greater than or equal to the interconnection reliability operating limit's Tv.~~

**Self-certification:** A process by which ~~whereby~~ an entity does a self-evaluation to determine if it is compliant with the specific requirements for a reliability standard. ~~submits a form to its compliance monitor, indicating that the entity is in compliance with a specific requirement or set of requirements for a reliability standard.~~

~~Self-certification forms generally require the signature of an officer of the corporation. Most self-certification forms are completed on an annual basis although they may be required more often~~

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**T<sub>v</sub>:** ~~The violation time associated with a limit.~~ The maximum time that an interconnection reliability operating limit can be exceeded without compliance sanctions being applied.

**Transmission Operator:** ~~The entity that provides transmission services to qualified market participants under applicable transmission service agreements.~~ The entity that operates the transmission facilities and executes switching orders.

**Transmission Owner:** Owns transmission facilities.

**Uncontrolled Separation:** The unplanned break-up of an interconnection, or portion of an interconnection, that is not the result of automatic action by a special protection system or remedial action scheme operating correctly.

**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 also be larger than a single Reliability Authority.

Note that the numbering scheme used in formatting the standard was revised and is not reflected here. In this version, defined terms are capitalized, but not highlighted as a change to the standard.

## Changes to Standard

### 201 IROL Identification

#### 1. Requirements

- 1.1. The Reliability Authority ~~and planning 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.
- 1.2. The Reliability Authority ~~and planning authority~~ shall identify each Interconnection Reliability Operating Limit within the Reliability Authority's Reliability ~~Authority~~ Area.
  - ~~1.2.1.~~ The Reliability Authority ~~or planning authority~~ shall identify a ~~maximum response time ( $T_v$ ) for any each~~ Interconnection reliability Operating Limit ~~.that does not already have a  $T_v$ .~~

#### 2. Measures

- 2.1. The ~~entity responsible~~ Reliability Authority shall ~~establish~~ have a list of Facilities (or groups of Facilities) in the Reliability Authority's Reliability ~~Authority~~ Area that are subject to Interconnection Reliability Operating Limits.
  - 2.1.1. ~~The Reliability Authority shall have evidence it reviews and updates the list of Facilities to reflect changes in system topology~~
- 2.2. The ~~entity responsible~~ Reliability Authority shall ~~establish~~ have a list of Interconnection Reliability Operating Limits for the Reliability Authority's Reliability ~~Authority~~ Area.
  - 2.2.1. The ~~entity responsible~~ Reliability Authority shall ~~establish~~ have a ~~maximum response time ( $T_v$ ) for any each~~ Interconnection Reliability Operating Limit. ~~.that does not already have a  $T_v$ .~~
- 2.3. The Reliability Authority shall update the list of Interconnection Reliability Operating Limit values to reflect current system conditions.

#### 3. Regional Differences

None identified.

#### 4. Compliance Monitoring Process

- 4.1. The ~~entity responsible~~ Reliability Authority shall demonstrate compliance through self-certification submitted to its Compliance Monitor annually. The Compliance Monitor may also use scheduled on-site reviews every three years, and investigations upon complaint, to assess performance.

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- 4.2. The performance-reset period shall ~~be one calendar year~~ 12 months from the last violation. The Reliability Authority ~~entity responsible~~ shall keep data on Facilities and limits for three calendar years. The Compliance Monitor shall keep audited data for three calendar years.
- 4.3. The ~~entity responsible~~ Reliability Authority shall have the following available upon the request of its Compliance Monitor:
  - 4.3.1. List of Facilities (or groups of Facilities) in the Reliability Authority's Reliability Authority Area that are subject to Interconnection Reliability Operating Limits
  - 4.3.2. List of Interconnection Reliability Operating Limits for the Reliability Authority's Reliability Authority Area
  - 4.3.3. Evidence that the list of Facilities subject to Interconnection Reliability Operating Limits and the list of Interconnection Reliability Operating Limits were updated.

### 5. Levels of Non-compliance

- 5.1. Level one: Not applicable
- 5.2. Level two: Not applicable
- 5.3. Level three: ~~Not applicable~~ Either the list of Interconnection Reliability Operating Limits or the list of Facilities subject to Interconnection Reliability Operating Limits was not updated.
- 5.4. Level four: No list of Interconnection Reliability Operating Limits or no list of Facilities subject to Interconnection Reliability Operating Limits ~~exists~~ for the Reliability Authority's Reliability Authority Area.

### 6. Sanctions

- 6.1. Apply sanctions consistent with the NERC Compliance and Enforcement Matrix. ~~(Attached at the end of this draft standard for reference and comment.)~~ In places where financial sanctions are applied for non-compliance, these penalties shall be the fixed dollar sanctions listed in the matrix, not the dollars per megawatt sanctions.



## **202 Monitoring**

### **1. Requirements**

- 1.1. The Reliability Authority shall ~~monitor real-time~~ perform Real-Time Monitoring of system operating parameters to determine if ~~it the Reliability Authority Area~~ is operating ~~its reliability area~~ within its Interconnection Reliability Operating Limits.

### **2. Measures**

- 2.1. The Reliability Authority shall have Interconnection Reliability Operating Limits available for its operations personnel's Real-time Use.
- 2.2. The Reliability Authority shall have Rreal-time Data available in a form that system operators can compare to the Interconnection Reliability Operating Limits.
- 2.3. The Reliability Authority shall monitor system operating parameters and compare these against its Interconnection Reliability Operating Limits.

### **3. Regional Differences**

None identified.

### **4. Compliance Monitoring Process**

- 4.1. The Reliability Authority shall demonstrate compliance through self-certification submitted to its Compliance Monitor annually. The Compliance Monitor may also use scheduled on-site reviews every three years, and investigations upon complaint, to assess performance.
- 4.2. The Performance-reset Period shall be ~~one calendar year~~ 12 months from the last violation. The Reliability Authority shall keep data on limits for three calendar years. The compliance monitor shall keep audited data for three calendar years.
- 4.3. The Rreliability Authority shall ~~have demonstrate~~ the following ~~available~~ upon the request of the Compliance Monitor:
  - 4.3.1. ~~Display(s) with real time data associated with interconnection reliability operating limits~~ System operators actively monitoring and comparing Real-time system operating parameters associated with Interconnection Reliability Operating Limits.

### **5. Levels of Non-compliance**

- 5.1. Level one: Not applicable
- 5.2. Level two: Not applicable
- 5.3. Level three: Not applicable

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- 5.4. Level four: A level four non-compliance occurs if any of the following conditions are present:
  - 5.4.1. Interconnection Reliability Operating Limits not available to operations personnel for real time use; or
  - 5.4.2. Real-time Data not available in a form that can be compared to the Interconnection Reliability Operating Limits; or
  - 5.4.3. System operating parameters not monitored and compared against Interconnection Reliability Operating Limits.

### 6. Sanctions

- ~~6.1.~~ Apply sanctions consistent with the NERC Compliance and Enforcement Matrix. ~~(Attached at the end of this draft standard for reference and comment.)~~ In places where financial sanctions are applied for non-compliance, these penalties shall be the fixed dollar sanctions listed in the matrix, not the dollars per megawatt sanctions.

## 203 Analyses and Assessments

### 1. Requirements

- 1.1. The Reliability Authority shall perform Operational Planning Analyses to ~~verify that its~~ assess whether the planned Bulk Electric System operations ~~within the Reliability Authority's Reliability Authority Area~~ will ~~not~~ exceed any of its Interconnection Reliability Operating Limits.
- 1.2. The Reliability Authority shall perform Real-time Assessments to ~~verify that it is not determine~~ if its Reliability Authority Area is exceeding any Interconnection Reliability Operating Limits ~~or is expected to exceed any Interconnection Reliability Operating Limits~~.

### 2. Measures

- 2.1. The Reliability Authority shall identify operating situations or events that impact its ~~ability to operate its~~ Reliability Authority Area's ~~ability to operate~~ without exceeding any Identified Interconnection Reliability Operating Limits.
  - 2.1.1. The Reliability Authority shall conduct an Operational Planning Analysis at least once each day, evaluating the next day's projected system operating conditions.
  - 2.1.2. The Reliability Authority shall conduct a Real-time Assessment periodically, but at least once every 30 minutes.

### 3. Regional Differences

None identified.

### 4. Compliance Monitoring Process

- 4.1. The Reliability Authority shall demonstrate compliance through self-certification submitted to its Compliance Monitor annually. The Compliance Monitor may also use scheduled on-site reviews once every three years, and investigations upon complaint, to assess performance.
- 4.2. The Performance-reset Period shall be ~~one day~~ 12 months from the last violation. The Compliance Monitor shall keep audited data for three calendar years.
- ~~4.3.~~ The Reliability Authority shall ~~demonstrate~~ identify the following upon the request of the Compliance Monitor:
  - ~~4.3.1. Ability to perform an operational planning analysis~~-The time the most recent Operational Planning Analysis was conducted
  - ~~4.3.2. Ability to perform a real time assessment~~-Whether the planned Bulk Electric System operations within the Reliability Authority's Reliability Authority Area will exceed any of its Interconnection Reliability Operating Limits
  - 4.3.3. The time the most recent Real-time Assessment was conducted

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- 4.3.4. Whether the assessment identified if its Reliability Authority Area is exceeding any Interconnection Reliability Operating Limits or is expected to exceed any Interconnection Reliability Operating Limits

### 5. Levels of Non-compliance — ~~Penalties Shall be Applied Separately~~

#### ~~Operational Planning Analysis~~

- 5.1. Level one: Not applicable
- 5.2. Level two: Not applicable
- 5.3. Level three: ~~Not applicable~~—A level three non-compliance exists if any of the following conditions are present:
  - 5.3.1. No indication that an Operational Planning Analysis was conducted at least once each day
  - 5.3.2. No indication that a Real-time Assessment was conducted at least once each 30 minutes
- 5.4. Level four: ~~Operational planning analysis was not conducted at least once each day~~—A level four non-compliance exists if either of the following conditions are present:
  - 5.4.1. The Reliability Authority could not identify whether the planned Bulk Electric System operations within the Reliability Authority's Reliability Authority Area will exceed any of its Interconnection Reliability Operating Limits, based on the results of the most recent Operational Planning Analysis
  - 5.4.2. The Reliability Authority could not identify whether the most recent Real-time Assessment identified if its Reliability Authority Area is exceeding any Interconnection Reliability Operating Limits or is expected to exceed any Interconnection Reliability Operating Limits

### 6. Sanctions

- ~~6.1.~~ Apply sanctions consistent with the NERC Compliance and Enforcement Matrix. ~~(Attached at the end of this draft standard for reference and comment.)~~ In places where financial sanctions are applied for non-compliance, these penalties shall be the fixed dollar sanctions listed in the matrix, not the dollars per megawatt sanctions.

## **204 Actions**

### **1. Requirements**

- 1.1. The Reliability Authority shall act<sup>1</sup> or direct others to act to:
  - 1.1.1. Prevent instances where Interconnection Reliability Operating Limits may be exceeded
  - 1.1.2. Mitigate the magnitude and duration of instances where Interconnection Reliability Operating Limits have been exceeded
- 1.2. The Reliability Authority shall document instances of exceeding Interconnection Reliability Operating Limits and shall document and complete an Interconnection Reliability Operating Limit Violation Report for instances of exceeding Interconnection Reliability Operating Limits for time greater than ~~or equal to~~  $T_v$ .
  - 1.2.1. The Reliability Authority shall measure the duration of the event from the point when the limit is exceeded to the point when the system has returned to a state that is within the Interconnection Reliability Operating Limits for a minimum of 30 seconds.

### **2. Measures**

- 2.1. The Reliability Authority shall document each instance ~~where actions are taken or directives are issued to mitigate the magnitude and duration~~ of exceeding an Interconnection Reliability Operating Limit:
  - 2.1.1. The reliability authority shall document, via an operations log or other data source, the actions taken or directives issued, the magnitude of the event, and the duration of the event. (This data may be from an operating log, may be from the entity's energy management system, or may be from some other source.)
- 2.2. The Reliability Authority shall report each instance of exceeding an Interconnection Reliability Operating Limit for time greater than ~~or equal to~~  $T_v$ :
  - 2.2.1. The Reliability Authority shall complete an Interconnection Reliability Operating Limit Violation Report and shall file the report with its Compliance Monitor within five business days of the initiation of the event. (The report includes the date and time of the event, identification of which Interconnection Reliability Operating Limit was violated and the  $T_v$  for that limit, magnitude and duration of exceeding the Interconnection Reliability Operating Limit, actions taken or directives issued ~~and the time these were initiated or issued~~, and explanation of results of actions or directives.)

### **3. Regional Differences**

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<sup>1</sup> Note that the reliability authority may choose to take 'no overt action' and this may be an acceptable action ~~as long as it is documented~~. Taking 'no overt action' is not the same as ignoring the problem.

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None identified.

### 4. Compliance Monitoring Process

- 4.1. The Reliability Authority shall demonstrate compliance through self-certification submitted to its Compliance Monitor annually. The Compliance Monitor may also use scheduled on-site reviews every three years, and investigations upon complaint, to assess performance.
- 4.2. The Performance-reset Period shall ~~be one calendar year~~ 12 months from the last violation. The Reliability Authority shall keep Interconnection Reliability Operating Limit Violation Reports, operations logs, or other documentation for three calendar years. The Compliance Monitor shall keep audited data for three calendar years.
- 4.3. The Reliability Authority shall have the following available upon the request of its Compliance Monitor:
  - 4.3.1. Operations logs or other documentation indicating the magnitude and duration of each instance of exceeding an Interconnection Reliability Operating Limit and the actions or directives issued for each of these instances
  - 4.3.2. Interconnection Reliability Operating Limit Violation Reports

### 5. Levels of Non-compliance <sup>2</sup>

- 5.1. Level one: Interconnection Reliability Operating Limit exceeded for a time less than or equal to  $T_v$  and no documentation to indicate actions taken or directives issued to mitigate the instance.
- 5.2. Level two: Not applicable
- 5.3. Level three: Not applicable
- 5.4. Level four: Interconnection Reliability Operating Limit exceeded for time greater than ~~or equal to~~  $T_v$  minutes

### 6. Sanctions

- ~~6.1.~~ Apply sanctions consistent with the NERC Compliance and Enforcement Matrix. *(Attached at the end of this draft standard for reference and comment.)* Level one non-compliance sanctions, shall be the fixed dollar sanctions listed in the matrix, not the per MW sanctions. Level four non-compliance sanctions shall be the greater of the fixed dollar sanctions listed in the matrix, or the number of megawatts above the Interconnection Reliability Operating Limit multiplied by the dollar value for the number of times non-compliant.

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<sup>2</sup> Note that the Reliability Authority may choose to take ‘no overt action’ and this may be an acceptable action as long as it is documented. Taking ‘no overt action’ is not the same as ignoring the problem.

## **205 Data Specification & Collection**

### **1. Requirements**

- 1.1. The Reliability Authority shall specify and collect the data it needs to support Real-time Monitoring, Operational Planning Analyses and Real-time Assessments conducted relative to operating within its Reliability Authority Area's Interconnection Reliability Operating Limits. The Reliability Authority shall collect this data from the entities performing functions that have Facilities monitored by the Reliability Authority, and from entities that provide Facility status to the Reliability Authority. This includes specifying and collecting data from the following:
  - 1.1.1. **Balancing Authorities**
  - 1.1.2. Generator Owners
  - 1.1.3. Generator Operators
  - 1.1.4. **Load Serving Entities**
  - 1.1.5. Reliability Authorities
  - 1.1.6. Transmission Operators
  - 1.1.7. Transmission Owners
- 1.2. The Reliability Authority shall specify when to supply data (based on its hardware and software requirements, and the time needed to do its Operational Planning Analyses.)
- 1.3. The Reliability Authority shall notify its Compliance Monitor when both of the following conditions are present:
  - 1.3.1. An entity that has data needed to support Real-time Monitoring, Operational Planning **Analyses** or Real-time Assessments relative to operating within the Reliability Authority's Reliability **Authority** Area has not provided data as specified, and
  - 1.3.2. The Reliability Authority was unable to resolve the issue with the entity responsible for providing the data

### **2. Measures**

- 2.1. The Reliability Authority shall have a documented specification for data needed to build and maintain models needed to support Real time Monitoring, Operational Planning Analyses and Real-time Assessments relative to Interconnection Reliability Operating Limits.
  - 2.1.1. Specification shall include a list of required data, a mutually agreeable format, and timeframe and periodicity for providing data.

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- 2.1.2. Specification shall address the data provision process to use when automated Real-time system operating data is unavailable.
- 2.2. The Reliability Authority shall **have evidence it has distributed** its data specification to the entities that have Facilities monitored by the Reliability Authority and to entities that provide Facility status to the Reliability Authority.
- 2.3. The Reliability Authority shall notify its Compliance Monitor when an entity that has Facilities monitored by the Reliability Authority, or an entity that provides Facility status to the Reliability Authority, does not provide data as specified.
  - 2.3.1. The notification shall take place within five business days of discovering that the data is missing.

### 3. Regional Differences

None identified.

### 4. Compliance Monitoring Process

- 4.1. The Reliability Authority shall demonstrate compliance through self-certification submitted to its Compliance Monitor annually. The Compliance Monitor may also use scheduled on-site reviews every three years, and investigations upon complaint, to assess performance.
- 4.2. The Performance-reset Period shall be **one calendar year 12 months from the last violation**. The Reliability Authority shall keep its data specification(s) for three calendar years. The Compliance Monitor shall keep audited data for three calendar years.
- 4.3. The Reliability Authority shall have the following available upon the request of the Compliance Monitor:
  - 4.3.1. Data specification(s)
  - 4.3.2. Proof of distribution of the data specification(s)

### 5. Levels of Non-compliance

- 5.1. Level one: Data specification incomplete (missing either the list of required data, a mutually agreeable format, a timeframe for providing data, or a data provision process to use when automated Real-time system operating data is unavailable.)
- 5.2. Level two: No data specification or the specification not distributed to the entities that have Facilities monitored by the Reliability Authority and the entities that provide the Reliability Authority with Facility status
- 5.3. Level three: Not applicable
- 5.4. Level four: Not applicable



**6. Sanctions**

- 6.1. Apply sanctions consistent with the NERC Compliance and Enforcement Matrix. ~~(Attached at the end of this draft standard for reference and comment.)~~ In places where financial sanctions are applied for non-compliance, these penalties shall be the fixed dollar sanctions listed in the matrix, not the dollars per megawatt sanctions.

**206 Data Provision**

**1. Requirements**

- 1.1. Each entity performing one of the following functions shall provide data, as specified, to the Reliability Authority(ies) with which it has a reliability relationship. ~~The data is limited to data needed by the Reliability Authority to support Real-time Monitoring, Operational Planning Analyses and Real-time Assessments conducted relative to operating within its Reliability Authority Area's Interconnection Reliability Operating Limits.~~

1.1.1. ~~Balancing Authorities~~

1.1.2. Generator Owners

1.1.3. Generator Operators

1.1.4. ~~Load Serving Entities~~

1.1.5. Reliability Authorities

1.1.6. Transmission Operators

1.1.7. Transmission Owners

**2. Measures**

- 2.1. The entity responsible shall ~~have evidence it has~~ provided data, as specified, to the requesting Reliability Authority, within the time frame specified, in the mutually agreed upon format., ~~or the responsible entity shall have evidence it has committed to providing the data, as specified, to the Reliability Authority, within the timeframe specified, in the mutually agreed upon format~~

**3. Regional Differences**

None identified.

**4. Compliance Monitoring Process**

- 4.1. The entity responsible shall demonstrate compliance through self-certification submitted to its Compliance Monitor annually. ~~The compliance monitor shall seek confirmation of the data transmission by checking with the receiving reliability authority.~~ The Compliance Monitor may also use scheduled on-site reviews every three years, and investigations upon complaint, to assess performance.
- 4.2. The Performance-reset Period is 12 months ~~without a violation~~ from the ~~time of the~~ last violation. The responsible entity shall keep data transmittal documentation for three calendar years. The Compliance Monitor shall keep audited data for three calendar years.

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4.3. The entity responsible shall have the following available upon the request of the Compliance Monitor:

~~4.3.1. Evidence indicating data was sent to the Reliability Authority or evidence that the entity responsible committed to providing the data on the specification. Copies of transmittal cover letters indicating data was sent to the reliability authority.~~

### 5. Levels of Non-compliance

5.1. Level one: Not applicable

5.2. Level two: Not applicable

5.3. Level three: Not applicable

5.4. Level four: Data was not provided to the Reliability Authority as specified and the situation was not resolved with the Reliability Authority.

### 6. Sanctions

~~6.1. Apply sanctions consistent with the NERC Compliance and Enforcement Matrix. (Attached at the end of this draft standard for reference and comment.)~~ In places where financial sanctions are applied for non-compliance, these penalties shall be the fixed dollar sanctions listed in the matrix, not the dollar per megawatt sanctions.

**207 Action Plan**

**1. Requirements**

- 1.1. 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.

**2. Measures**

- 2.1. The Reliability Authority shall have a documented action plan that addresses preventing and mitigating instances of exceeding Interconnection Reliability Operating Limits. The plan shall **identify and** be coordinated with those entities responsible for acting and with those entities impacted by such actions.
  - 2.1.1. The action plan may be a process or procedure for preventing or mitigating instances of exceeding Interconnected Reliability Operating Limits. (Note: an emergency operations plan may be used to satisfy this requirement if the emergency operations plan addresses actions to prevent and mitigate instances of exceeding interconnected reliability operating limits.)

**3. Regional Differences**

None identified.

**4. Compliance Monitoring Process**

- 4.1. The Reliability Authority shall demonstrate compliance through self-certification submitted to its Compliance monitor annually. The Compliance Monitor may also use scheduled on-site reviews every three years, and investigations upon complaint, to assess performance.
- 4.2. The Performance-reset Period is 12 months **from the last violation**. The Reliability Authority shall keep its action plan for three calendar years. The Compliance Monitor shall keep audit records for three calendar years.
- 4.3. The Reliability Authority shall make the following available for inspection by the Compliance Monitor upon request:
  - 4.3.1. Action plan

**5. Levels of Non-compliance**

- 5.1. Level one: Action plan exists but wasn't coordinated with all involved and impacted entities
- 5.2. Level two: Action plan exists but wasn't coordinated with any involved or any impacted entities
- 5.3. Level three: Not applicable.
- 5.4. Level four: No action plan

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### 6. Sanctions

- 6.1. Apply sanctions consistent with the NERC Compliance and Enforcement Matrix. ~~(Attached at the end of this draft standard for reference and comment.)~~ In places where financial sanctions are applied for non-compliance, these penalties shall be the fixed dollar sanctions listed in the matrix, not the dollars per megawatt sanctions.

**208 Reliability Authority Directives**

**1. Requirements**

- 1.1. The Transmission Operator, Balancing Authority, And Interchange Authority shall follow the Reliability Authority's directives to:
  - 1.1.1. Prevent instances where Interconnection Reliability Operating Limits may be exceeded
  - 1.1.2. Mitigate the magnitude and duration of instances where Interconnection Reliability Operating Limits have been exceeded
- 1.2. The entity responsible shall document the reliability authority's directives and the actions taken

**2. Measures**

- 2.1. The entity responsible shall follow the Reliability Authority's directives and shall document the directives and actions taken to meet the directives
- 2.2. The entity responsible shall document via an operations log or other data source, the following for each directive it receives relative to an Interconnection Reliability Operating Limit:
  - 2.2.1. Date and time of directive received
  - 2.2.2. Directive issued
  - 2.2.3. Actions taken in response to directive

**3. Regional Differences**

None identified.

**4. Compliance Monitoring Process**

- 4.1. The entity responsible shall demonstrate compliance through self-certification submitted to its Compliance Monitor annually. The Compliance Monitor may also use scheduled on-site reviews every three years, and investigations upon complaint to assess performance.
- 4.2. The Performance-reset Period is 12 months [from the last violation](#). The entity responsible shall keep its documentation for three calendar years. The Compliance Monitor shall keep audit records for three calendar years.
- 4.3. The entity responsible shall make the following available for inspection by the Compliance Monitor upon request:
  - 4.3.1. Operations log or other data source(s) to show the following for each instance of being issued a Reliability Authority directive relative to an Interconnection Reliability Operating Limit:

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4.3.1.1. Date and time of each of directive received

4.3.1.2. Directive issued

4.3.1.3. Actions taken in response to directive

### 5. Levels of Non-compliance

5.1. Level one: ~~Not applicable.~~ Entity followed Reliability Authority's directives relative to preventing or mitigating instances of exceeding Interconnection Reliability Operating Limits but did not document the data and time of each directive received, the directive received and the actions taken in response to the directive.

5.2. Level two: Not applicable.

5.3. Level three: Not applicable.

5.4. Level four: Entity did not follow the Reliability Authority's directives.

### 6. Sanctions

6.1. Apply sanctions consistent with the NERC Compliance and Enforcement Matrix. ~~(Attached at the end of this draft standard for reference and comment.)~~ In places where financial sanctions are applied for non-compliance, these penalties shall be the fixed dollar sanctions listed in the matrix, not the dollars per megawatt sanctions.

**Draft Comments and Considerations for 2<sup>nd</sup> Posting for Operate Within IROLs Standard Requirement 201 – IROL Identification**

**Requirement 201 - Interconnection Reliability Operating Limit Identification - Do you agree with the requirement?**

Commenter	Yes	No	Comments
Terry Bilke Midwest ISO #2	x		
Ken Githens Allegheny Energy Supply	x		
William Smith Allegheny Power #1	x		
NPCC CP9 Michael Schiavone National Grid USA #1 Roger Champagne Hydro-Quebec TransEnergie #1 Ralph Rufrano New York Power Authority #1 David Little Nova Scotia Power Inc. #1 David Kiguel Hydro One Networks #1 Michael Potishnak ISO-New England #2 Barry Gee National Grid USA #1 Dan Stosick ISO-New England #2 Fernando Saavedra ISO-New England #2 Greg Campoli New York ISO #2	x		
Peter Burke ATC #1	x		
Charles Yeung Reliant #5	x		
Gerald Rheault Manitoba Hydro #1, 3, 5, 6	x		
Alan Boesch NPPD #1	x		
Raymond Mammarella PPL Elec Util #1	x		
Tom Pruitt Duke Power #1	x		
Michael Sidiropoulos Pacificorp	x		
Robert Grover PPL Elec Util #3	x		
MAAP Ops Subcommittee #2 Llyod Linke MAPP Allan Silk Manitoba Hydro Paul Brune NPPD Tod Gosnell Omaha Public Pwr Dist Paul Koskela Minnesota Pwr Larry Larson Otter Tail Power Derrick Moe WAPA Dick Pursley Great River Energy Martin Trencce Xcel Energy	x		



**Draft Comments and Considerations for 2<sup>nd</sup> Posting for Operate Within IROLs Standard Requirement 201 – IROL Identification**

Joseph Knight MAPPCOR			
John Horakh MAAC #2	x		
Darrell Richardson Illinois Power #1, 3	x		
David Thorne Pepco #1	x		
<u>SERC Operations Planning Subcommittee</u> Carter Edge SEPA #4, 5 William Gaither So Carolina Pub Serv Auth #1 Mike Miller Southern Co #1 Roger Brand Muni Elec Auth GA #1 Phil Creech Progress Energy – CP&L #1 Gene Delk So Carolina Elec & Gas #1 Al McMeekin So Carolina Elec & Gas #1 Greg Ott Alcoa-Yadkin #1 Doug Newbaue GA System Operations #1 Mike Clements TVA #1 Don Reichenbach Duke Energy #1 Lynna Estep SERC #2 Mark Creech TVA #1	x		
Albert DiCaprio MAAC #2	x		
<u>Trans Subcommittee</u> Robert E. Reed PJM Daniel Cooper Michigan Public Power Agency Ken Donohoo ERCOT Michael Gildea Duke-Energy, North America Francis Halpin Bonneville Power Administration Tom Mallinger Midwest ISO Darrick Moe Western Area Power Adm Scott Moore American Electric Power Bill Slater Florida Power Corporation Tom Stuchlik Western Resources Joseph Styslinger Southern Company David Thorne D. H. Thorne Consultants, Inc Robert Waldele New York ISO Roman Carter Southern Company	x		

**Draft Comments and Considerations for 2<sup>nd</sup> Posting for Operate Within IROLs Standard Requirement 201 – IROL Identification**

John Ahr Alleghany Power Systems Susan Morris SERC Ed Pfeiffer Ameren Ray Palmieri ECAR Tom Vandervort NERC			
Mark Heimbach PPL Generation #6	x		
<u>Centerpoint Energy #1</u> Richard Sikes John Jonte Wayne Kemper Glenn Hemperley Brad Calhoun	x		
<u>FRCC Op, Eng &amp; Mkt Int</u> Linda Campbell FRCC #2 Paul Elwing Lakeland Electric # 3 John Shaffer FPL #1 Bob Remley Clay Elec Coop #4 Patti Metro FRCC #2 Eirc Grant Progress Energy – FL #1 Joe Roos Ocala Electric Utility #3 Joe Krupar FL Muni Pwr Agency #3 Richard Gilbert Lakeland Electric #3 Bill Slater Progress Energy – FL #1 Amy Long Lakeland Electric #1 Roger Westphal Gainesville Regional Util #5 Bob Goss SEPA #5 Steve Wallace Seminore Electric Coop #4 Ted Hobson JEA #1	x	x	
Tony Jankowski We Energies #4		x	Standard and requirements shall apply to only one function! There should be only one responsible function
<b>Agreed. The standard was revised so that the requirements are only applicable to the reliability authority.</b>			
Stuart Goza TVA #1		x	
Dan Boezio & Raj Rana AEP #1, 3, 5, 6		x	
Susan Morris SERC #2		x	

**Draft Comments and Considerations for 2<sup>nd</sup> Posting for Operate Within IROLs Standard Requirement 201 – IROL Identification**

Bill Reinke SERC #2 Sam Stryker Fayettevill PWC #3, 4, 5 Carter Edge SEPA #4, 5 Bill Thompson Dominion Trans #1			
<u>Operating Reliability Working Group SPP</u> Gerry Burrows KCP&L #1 Bob Cochran SPS #1 Peter Kuebeck OG&E #1 Scott Moore AEP #1 Tom Stuchlik Westar #1 Dan Boezio AEP #1 Matt Bordelon CLECO #1 Mike Crouch WFEC #1 Mike Gammon KCP&L #1 Kevin Goolsby SPP #2 Bo Jones Westar #1 Allen Klassen Westar #1 Thad Ness AEP #1 Harold Wyble KCP&L #1 Robert Rhodes SPP #2		x	
<u>Southern Co Transmission Planning #1</u> Todd Lucas Southern Co Joe Payne Mississippi Power Company Travis Koval Southern Co Bill Pope Gulf Power Company John Clark Southern Co David Johnson Savannah Electric Mike Miller Southern Co Jim Griffith Southern Co Monroe Landrum Southern Co		x	
<u>BPA Adm TBL #1</u> James Murphy Mike Viles James Randall Al Johnson Jeff Newby Jim Gronquist Sylvia Wiggerhaus Brian Tuck		x	

**Draft Comments and Considerations for 2<sup>nd</sup> Posting for Operate Within IROLs Standard Requirement 201 – IROL Identification**

Dick Spence Tracy Rolstad Steve Hitchens			
Ed Davis Entergy Services #1		x	
<u>Southern Company Generation &amp; Energy Mktg</u> Roman Carter # 5, 6 Joel Dison #5,6 Tony Reed #5,6 Lucius Burris #5,6 David Deerman #5,6 Clifford Shepard #5,6 Michael Smith #5,6 Lloyd Barnes SCGEM 5,6 Gary Miller SCGEM 5,6 Terry Crawley Southern Generation 5 Roger Green Southern Generation 5		x	
Alan Johnson Mirant Americas Energy Mktg #6		x	
Kathleen Goodman ISO-NE #2		x	

**Draft Comments and Considerations for 2<sup>nd</sup> Posting for Operate Within IROLs Standard Requirement 201 – IROL Identification**

**Requirement 201 - Interconnection Reliability Operating Limit Identification -Do you agree with the measures?**

Commenter	Yes	No	Comments
Terry Bilke Midwest ISO #2	x		
Ken Githens Allegheny Energy Supply	x		
William Smith Allegheny Power #1	x		
Stuart Goza TVA #1	x		
<u>NPCC CP9</u> Michael Schiavone National Grid USA #1 Roger Champagne Hydro-Quebec TransEnergie #1 Ralph Rufrano New York Power Authority #1 David Little Nova Scotia Power Inc. #1 David Kiguel Hydro One Networks #1 Michael Potishnak ISO-New England #2 Barry Gee National Grid USA #1 Dan Stosick ISO-New England #2 Fernando Saavedra ISO-New England #2 Greg Campoli New York ISO #2	x		
<u>Southern Co Transmission Planning #1</u> Todd Lucas Southern Co Joe Payne Mississippi Power Company Travis Koval Southern Co Bill Pope Gulf Power Company John Clark Southern Co David Johnson Savannah Electric Mike Miller Southern Co Jim Griffith Southern Co Monroe Landrum Southern Co	x		
Peter Burke ATC #1	x		
Gerald Rheault Manitoba Hydro #1, 3, 5, 6	x		
Alan Boesch NPPD #1	x		
Dan Boezio & Raj Rana AEP #1, 3, 5, 6	x		
Raymond Mammarella PPL Elec Util #1	x		
Michael Sidiropoulos Pacificorp	x		
Robert Grover PPL Elec Util #3	x		
<u>Southern Co Transmission Planning</u>	x		

**Draft Comments and Considerations for 2<sup>nd</sup> Posting for Operate Within IROLs Standard Requirement 201 – IROL Identification**

Todd Lucas Southern Co #1 Joe Payne Mississippi Pwr Co #3 Travis Koval Southern Co #1 Bill Pope Gulf Pwr Co #3 John Clark Southern Co #1 David Johnson Savannah Electric #3			
<u>MAAP Ops Subcommittee #2</u> Llyod Linke MAPP Allan Silk Manitoba Hydro Paul Brune NPPD Tod Gosnell Omaha Public Pwr Dist Paul Koskela Minnesota Pwr Larry Larson Otter Tail Power Derrick Moe WAPA Dick Pursley Great River Energy Martin Trence Xcel Energy Joseph Knight MAPPCOR	x		
John Horakh MAAC #2	x		
<u>BPA Adm TBL #1</u> James Murphy Mike Viles James Randall Al Johnson Jeff Newby Jim Gronquist Sylvia Wiggerhaus Brian Tuck Dick Spence Tracy Rolstad Steve Hitchens	x		
Darrell Richardson Illinois Power #1, 3	x		
David Thorne Pepco #1	x		
<u>SERC Operations Planning Subcommittee</u> Carter Edge SEPA #4, 5 William Gaither So Carolina Pub Serv Auth #1 Mike Miller Southern Co #1 Roger Brand Muni Elec Auth GA #1 Phil Creech Progress Energy – CP&L #1 Gene Delk So Carolina Elec & Gas #1	x		

**Draft Comments and Considerations for 2<sup>nd</sup> Posting for Operate Within IROLs Standard Requirement 201 – IROL Identification**

Al McMeekin So Carolina Elec & Gas #1 Greg Ott Alcoa-Yadkin #1 Doug Newbaue GA System Operations #1 Mike Clements TVA #1 Don Reichenbach Duke Energy #1 Lynna Estep SERC #2 Mark Creech TVA #1			
Albert DiCaprio MAAC #2	x		
Mark Heimbach PPL Generation #6	x		
<u>Centerpoint Energy #1</u> Richard Sikes John Jonte Wayne Kemper Glenn Hemperley Brad Calhoun	x		
<u>Trans Subcommittee</u> Robert E. Reed PJM Daniel Cooper Michigan Public Power Agency Ken Donohoo ERCOT Michael Gildea Duke-Energy, North America Francis Halpin Bonneville Power Administration Tom Mallinger Midwest ISO Darrick Moe Western Area Power Adm Scott Moore American Electric Power Bill Slater Florida Power Corporation Tom Stuchlik Western Resources Joseph Styslinger Southern Company David Thorne D. H. Thorne Consultants, Inc Robert Waldele New York ISO Roman Carter Southern Company John Ahr Alleghany Power Systems Susan Morris SERC Ed Pfeiffer Ameren Ray Palmieri ECAR	x		

**Draft Comments and Considerations for 2<sup>nd</sup> Posting for Operate Within IROLs Standard Requirement 201 – IROL Identification**

Tom Vandervort NERC			
<u>Southern Company Generation &amp; Energy Mktg</u> Roman Carter # 5, 6 Joel Dison #5,6 Tony Reed #5,6 Lucius Burris #5,6 David Deerman #5,6 Clifford Shepard #5,6 Michael Smith #5,6 Lloyd Barnes SCGEM 5,6 Gary Miller SCGEM 5,6 Terry Crawley Southern Generation 5 Roger Green Southern Generation 5	x		
Ed Davis Entergy Services #1		x	
Alan Johnson Mirant Americas Energy Mktg #6		x	
Tom Pruitt Duke Power #1		x	
Tony Jankowski We Energies #4		x	Where does the Buck stop?
<b>The buck stops with the reliability authority</b>			
<u>Operating Reliability Working Group SPP</u> Gerry Burrows KCP&L #1 Bob Cochran SPS #1 Peter Kuebeck OG&E #1 Scott Moore AEP #1 Tom Stuchlik Westar #1 Dan Boezio AEP #1 Matt Bordelon CLECO #1 Mike Crouch WFEC #1 Mike Gammon KCP&L #1 Kevin Goolsby SPP #2 Bo Jones Westar #1 Allen Klassen Westar #1 Thad Ness AEP #1 Harold Wyble KCP&L #1 Robert Rhodes SPP #2		x	



**Draft Comments and Considerations for 2<sup>nd</sup> Posting for Operate Within IROLs Standard Requirement 201 – IROL Identification**

Charles Yeung Reliant #5		x	
Susan Morris SERC #2 Bill Reinke SERC #2 Sam Stryker Fayettevill PWC #3, 4, 5 Carter Edge SEPA #4, 5 Bill Thompson Dominion Trans #1		x	
FRCC Op, Eng & Mkt Int Linda Campbell FRCC #2 Paul Elwing Lakeland Electric # 3 John Shaffer FPL #1 Bob Remley Clay Elec Coop #4 Patti Metro FRCC #2 Eirc Grant Progress Energy – FL #1 Joe Roos Ocala Electric Utility #3 Joe Krupar FL Muni Pwr Agency #3 Richard Gilbert Lakeland Electric #3 Bill Slater Progress Energy – FL #1 Amy Long Lakeland Electric #1 Roger Westphal Gainesville Regional Util #5 Bob Goss SEPA #5 Steve Wallace Seminore Electric Coop #4 Ted Hobson JEA #1		x	
Kathleen Goodman ISO-NE #2		x	

**Draft Comments and Considerations for 2<sup>nd</sup> Posting for Operate Within IROLs Standard Requirement 201 – IROL Identification**

**Requirement 201 - Interconnection Reliability Operating Limit Identification - Do you agree with the compliance monitoring process?**

Commenter	Yes	No	Comments
Terry Bilke Midwest ISO #2	x		
Ken Githens Allegheny Energy Supply	x		
William Smith Allegheny Power #1	x		
<u>Southern Co Transmission Planning #1</u> Todd Lucas Southern Co Joe Payne Mississippi Power Company Travis Koval Southern Co Bill Pope Gulf Power Company John Clark Southern Co David Johnson Savannah Electric Mike Miller Southern Co Jim Griffith Southern Co Monroe Landrum Southern Co	x		
Peter Burke ATC #1	x		
Gerald Rheault Manitoba Hydro #1, 3, 5, 6	x		
<u>FRCC Op, Eng &amp; Mkt Int</u> Linda Campbell FRCC #2 Paul Elwing Lakeland Electric # 3 John Shaffer FPL #1 Bob Remley Clay Elec Coop #4 Patti Metro FRCC #2 Eirc Grant Progress Energy – FL #1 Joe Roos Ocala Electric Utility #3 Joe Krupar FL Muni Pwr Agency #3 Richard Gilbert Lakeland Electric #3 Bill Slater Progress Energy – FL #1 Amy Long Lakeland Electric #1 Roger Westphal Gainesville Regional Util #5 Bob Goss SEPA #5 Steve Wallace Seminore Electric Coop #4 Ted Hobson JEA #1	x		

**Draft Comments and Considerations for 2<sup>nd</sup> Posting for Operate Within IROLs Standard Requirement 201 – IROL Identification**

Alan Boesch NPPD #1	x		
Raymond Mammarella PPL Elec Util #1	x		
Tom Pruitt Duke Power #1	x		
Michael Sidiropoulos Pacificorp	x		
Robert Grover PPL Elec Util #3	x		
<u>Southern Co Transmission Planning</u> Todd Lucas Southern Co #1 Joe Payne Mississippi Pwr Co #3 Travis Koval Southern Co #1 Bill Pope Gulf Pwr Co #3 John Clark Southern Co #1 David Johnson Savannah Electric #3	x		
John Horakh MAAC #2	x		
<u>BPA Adm TBL #1</u> James Murphy Mike Viles James Randall Al Johnson Jeff Newby Jim Gronquist Sylvia Wiggerhaus Brian Tuck Dick Spence Tracy Rolstad Steve Hitchens	x		
Darrell Richardson Illinois Power #1, 3	x		
David Thorne Pepco #1	x		
Albert DiCaprio MAAC #2	x		
Mark Heimbach PPL Generation #6	x		
<u>Centerpoint Energy #1</u> Richard Sikes John Jonte Wayne Kemper Glenn Hemperley Brad Calhoun	x		
<u>Trans Subcommittee</u> Robert E. Reed PJM Daniel Cooper Michigan Public Power Agency	x		

**Draft Comments and Considerations for 2<sup>nd</sup> Posting for Operate Within IROLs Standard Requirement 201 – IROL Identification**

Ken Donohoo ERCOT Michael Gildea Duke-Energy, North America Francis Halpin Bonneville Power Administration Tom Mallinger Midwest ISO Darrick Moe Western Area Power Adm Scott Moore American Electric Power Bill Slater Florida Power Corporation Tom Stuchlik Western Resources Joseph Styslinger Southern Company David Thorne D. H. Thorne Consultants, Inc Robert Waldele New York ISO Roman Carter Southern Company John Ahr Alleghany Power Systems Susan Morris SERC Ed Pfeiffer Ameren Ray Palmieri ECAR Tom Vandervort NERC			
<u>Southern Company Generation &amp; Energy Mktg</u> Roman Carter # 5, 6 Joel Dison #5,6 Tony Reed #5,6 Lucius Burris #5,6 David Deerman #5,6 Clifford Shepard #5,6 Michael Smith #5,6 Lloyd Barnes SCGEM 5,6 Gary Miller SCGEM 5,6 Terry Crawley Southern Generation 5 Roger Green Southern Generation 5	x		
Tony Jankowski We Energies #4		x	Only the RA should be listed.
<b>The standard was revised so the reliability authority is the only entity responsible for this requirement.</b>			
<u>Compliance Subcommittee</u>			Change 4.1 to: The responsible entity shall demonstrate compliance to the compliance monitor within the first year that this standard becomes effective or the first year the entity commences operation by

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			<p>information submittal to the compliance monitor, either on or off site at the compliance monitors discretion.</p> <p>4.2 Subsequent to the initial compliance review, the entity responsible shall demonstrate compliance through self-certification submitted to its compliance monitor annually.</p> <p>4.3 Compliance will be re-verified at least every three years using a scheduled on-site review method or un-scheduled (investigation) method, or review of information submitted as requested, at the discretion of the compliance monitor.</p> <p>Change 4.2 and 4.3 to 4.4 and 4.5</p>
<p>The suggested language changes were not adopted for the following reasons.</p> <ul style="list-style-type: none"> <li>- "Information submittal" is an undefined term. Industry commenters have asked that the compliance elements be as specific as possible so that there won't be huge variations from region to region in the application of the compliance monitoring. If an 'information submittal' is the same as a self-certification document, then this is already covered in the original language. Including language that gives each compliance monitor the flexibility to assess this requirement however it chooses, does not conform with the industry's requests for standardization in the compliance monitoring process.</li> </ul> <p>The only significant change between the original language and the proposed new section 4.2 is the addition of the concept that the compliance monitor has the freedom to either conduct an audit per a schedule, or just show up unscheduled. Again, this does not support the industry's request for increased standardization in the compliance monitoring process. The original language included the option of conducting an 'investigation upon compliant' and this seems more appropriate than unscheduled audits.</p>			
Stuart Goza TVA #1		x	
<u>NPCC CP9</u> Michael Schiavone National Grid USA #1 Roger Champagne Hydro-Quebec TransEnergie #1 Ralph Rufrano New York Power Authority #1 David Little Nova Scotia Power Inc. #1 David Kiguel Hydro One Networks #1 Michael Potishnak ISO-New England #2 Barry Gee National Grid USA #1 Dan Stosick ISO-New England #2 Fernando Saavedra ISO-New England #2 Greg Campoli New York ISO #2		x	
Charles Yeung Reliant #5		x	
Susan Morris SERC #2 Bill Reinke SERC #2 Sam Stryker Fayettevill PWC #3, 4, 5 Carter Edge SEPA #4, 5 Bill Thompson Dominion Trans #1		x	

**Draft Comments and Considerations for 2<sup>nd</sup> Posting for Operate Within IROLs Standard Requirement 201 – IROL Identification**

Dan Boezio & Raj Rana AEP #1, 3, 5, 6		x	
<u>Operating Reliability Working Group SPP</u> Gerry Burrows KCP&L #1 Bob Cochran SPS #1 Peter Kuebeck OG&E #1 Scott Moore AEP #1 Tom Stuchlik Westar #1 Dan Boezio AEP #1 Matt Bordelon CLECO #1 Mike Crouch WFECC #1 Mike Gammon KCP&L #1 Kevin Goolsby SPP #2 Bo Jones Westar #1 Allen Klassen Westar #1 Thad Ness AEP #1 Harold Wyble KCP&L #1 Robert Rhodes SPP #2		x	
<u>MAAP Ops Subcommittee #2</u> Llyod Linke MAPP Allan Silk Manitoba Hydro Paul Brune NPPD Tod Gosnell Omaha Public Pwr Dist Paul Koskela Minnesota Pwr Larry Larson Otter Tail Power Derrick Moe WAPA Dick Pursley Great River Energy Martin Trencce Xcel Energy Joseph Knight MAPPCOR		x	
Ed Davis Entergy Services #1		x	
<u>SERC Operations Planning Subcommittee</u> Carter Edge SEPA #4, 5 William Gaither So Carolina Pub Serv Auth #1 Mike Miller Southern Co #1 Roger Brand Muni Elec Auth GA #1		x	

**Draft Comments and Considerations for 2<sup>nd</sup> Posting for Operate Within IROLs Standard Requirement 201 – IROL Identification**

Phil Creech Progress Energy – CP&L #1 Gene Delk So Carolina Elec & Gas #1 Al McMeekin So Carolina Elec & Gas #1 Greg Ott Alcoa-Yadkin #1 Doug Newbaue GA System Operations #1 Mike Clements TVA #1 Don Reichenbach Duke Energy #1 Lynna Estep SERC #2 Mark Creech TVA #1			
Alan Johnson Mirant Americas Energy Mktg #6		x	
Kathleen Goodman ISO-NE #2		x	

**Draft Comments and Considerations for 2<sup>nd</sup> Posting for Operate Within IROLs Standard Requirement 201 – IROL Identification**

**Requirement 201 - Interconnection Reliability Operating Limit Identification -Do you agree with the levels of non-compliance?**

Commenter	Yes	No	Comments
Terry Bilke Midwest ISO #2	x		
Ken Githens Allegheny Energy Supply	x		
Stuart Goza TVA #1	x		
<u>Southern Co Transmission Planning #1</u> Todd Lucas Southern Co Joe Payne Mississippi Power Company Travis Koval Southern Co Bill Pope Gulf Power Company John Clark Southern Co David Johnson Savannah Electric Mike Miller Southern Co Jim Griffith Southern Co Monroe Landrum Southern Co	x		
Peter Burke ATC #1	x		
Susan Morris SERC #2 Bill Reinke SERC #2 Sam Stryker Fayettevill PWC #3, 4, 5 Carter Edge SEPA #4, 5 Bill Thompson Dominion Trans #1	x		
Gerald Rheault Manitoba Hydro #1, 3, 5, 6	x		
Raymond Mammarella PPL Elec Util #1	x		
Tony Jankowski We Energies #4	x		
Michael Sidiropoulos Pacificorp	x		
Robert Grover PPL Elec Util #3	x		
<u>Southern Co Transmission Planning</u> Todd Lucas Southern Co #1 Joe Payne Mississippi Pwr Co #3 Travis Koval Southern Co #1 Bill Pope Gulf Pwr Co #3 John Clark Southern Co #1 David Johnson Savannah Electric #3	x		



**Draft Comments and Considerations for 2<sup>nd</sup> Posting for Operate Within IROLs Standard Requirement 201 – IROL Identification**

John Horakh MAAC #2	x		
<u>BPA Adm TBL #1</u>	x		
James Murphy Mike Viles			
James Randall Al Johnson			
Jeff Newby Jim Gronquist			
Sylvia Wiggerhaus Brian Tuck			
Dick Spence Tracy Rolstad			
Steve Hitchens			
Darrell Richardson Illinois Power #1, 3	x		
David Thorne Pepco #1	x		
Ed Davis Entergy Services #1	x		
<u>SERC Operations Planning Subcommittee</u>	x		
Carter Edge SEPA #4, 5			
William Gaither So Carolina Pub Serv Auth #1			
Mike Miller Southern Co #1			
Roger Brand Muni Elec Auth GA #1			
Phil Creech Progress Energy – CP&L #1			
Gene Delk So Carolina Elec & Gas #1			
Al McMeekin So Carolina Elec & Gas #1			
Greg Ott Alcoa-Yadkin #1			
Doug Newbaue GA System Operations #1			
Mike Clements TVA #1			
Don Reichenbach Duke Energy #1			
Lynna Estep SERC #2			
Mark Creech TVA #1			
Mark Heimbach PPL Generation #6	x		
<u>Centerpoint Energy #1</u>	x		
Richard Sikes			
John Jonte			
Wayne Kemper			
Glenn Hemperley			
Brad Calhoun			

**Draft Comments and Considerations for 2<sup>nd</sup> Posting for Operate Within IROLs Standard Requirement 201 – IROL Identification**

<u>Southern Company Generation &amp; Energy Mktg</u> Roman Carter # 5, 6 Joel Dison #5,6 Tony Reed #5,6 Lucius Burris #5,6 David Deerman #5,6 Clifford Shepard #5,6 Michael Smith #5,6 Lloyd Barnes SCGEM 5,6 Gary Miller SCGEM 5,6 Terry Crawley Southern Generation 5 Roger Green Southern Generation 5	x		
Albert DiCaprio MAAC #2	x	x	
<u>NPCC CP9</u> Michael Schiavone National Grid USA #1 Roger Champagne Hydro-Quebec TransEnergie #1 Ralph Rufrano New York Power Authority #1 David Little Nova Scotia Power Inc. #1 David Kiguel Hydro One Networks #1 Michael Potishnak ISO-New England #2 Barry Gee National Grid USA #1 Dan Stosick ISO-New England #2 Fernando Saavedra ISO-New England #2 Greg Campoli New York ISO #2		x	
Dan Boezio & Raj Rana AEP #1, 3, 5, 6		x	
Tom Pruitt Duke Power #1		x	
<u>FRCC Op, Eng &amp; Mkt Int</u> Linda Campbell FRCC #2 Paul Elwing Lakeland Electric # 3 John Shaffer FPL #1 Bob Remley Clay Elec Coop #4 Patti Metro FRCC #2 Eirc Grant Progress Energy – FL #1 Joe Roos Ocala Electric Utility #3 Joe Krupar FL Muni Pwr Agency #3 Richard Gilbert Lakeland Electric #3 Bill Slater Progress Energy – FL #1 Amy Long Lakeland Electric #1		x	

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Roger Westphal Gainesville Regional Util #5 Bob Goss SEPA #5 Steve Wallace Seminore Electric Coop #4 Ted Hobson JEA #1			
<u>Operating Reliability Working Group SPP</u> Gerry Burrows KCP&L #1 Bob Cochran SPS #1 Peter Kuebeck OG&E #1 Scott Moore AEP #1 Tom Stuchlik Westar #1 Dan Boezio AEP #1 Matt Bordelon CLECO #1 Mike Crouch WFEC #1 Mike Gammon KCP&L #1 Kevin Goolsby SPP #2 Bo Jones Westar #1 Allen Klassen Westar #1 Thad Ness AEP #1 Harold Wyble KCP&L #1 Robert Rhodes SPP #2		x	
Kathleen Goodman ISO-NE #2		x	
<u>MAAP Ops Subcommittee #2</u> Llyod Linke MAPP Allan Silk Manitoba Hydro Paul Brune NPPD Tod Gosnell Omaha Public Pwr Dist Paul Koskela Minnesota Pwr Larry Larson Otter Tail Power Derrick Moe WAPA Dick Pursley Great River Energy Martin Trence Xcel Energy Joseph Knight MAPPCOR		x	

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**Requirement 201 - Interconnection Reliability Operating Limit Identification –Other Comments**

**Summary Consideration:** While there were many comments recommending specific changes, most commenters indicated support of the requirement, its measures, the compliance monitoring process and the levels of non-compliance. The following changes were made to further improve the level of consensus on this requirement:

- The planning authority was removed from the list of functions that must comply with this requirement.
- The requirement and measures were modified to reflect that the RA must modify its lists so they reflect changes to the system.
- The compliance monitoring process was modified to change the performance reset period to '12 months from the last violation'
- An additional level of non-compliance was added to address situations where an entity may have lists but these lists have not been updated to reflect system changes.

The SDT was unable to accommodate the changes recommending that the Transmission Owner and Transmission Operator be added to this requirement. The Functional Model assigns responsibility for establishing reliability limits to the Reliability Authority and these new standards must be written in a manner that supports the delineation of responsibility outlined in the Functional Model.

Commenter	Comments
<p>Ron Falsetti IMO #2</p>	<p>IMO believes that the present definition of Tv, which is 'self-defined, as so broad that the re-preparation time of thirty minutes has been lost. It is unclear if this was indeed the intent based on Section 203 requirements 1.1 and 1.2 and measure 2.1.2.</p> <p>The reliability authority or planning authority identifying Tv must establish and present the process through which Tv is derived, or the re-preparation time of thirty minutes should become the standard default absent such a process.</p> <p>The reliability authority or planning authority identifying Tv in one region/area must have a peer review and dispute resolution process with its neighboring region(s)/area(s) to ensure a mutually acceptable Tv.</p> <p>Additionally, Section 1.1 suggests the need for a demonstrated process to “. . . identify and document which facilities (or groups of facilities) in the reliability authority’s reliability area are subject to interconnection reliability operating limits.” The mechanism to determine this critical element of the definition cannot be left open-ended. Without a recognized and accepted process, significant inconsistencies will result throughout the interconnections.</p>
<p>Thirty minutes is not a 'perfect' Tv for all IROLs. Not all IROLs are the same and the risk associated with exceeding IROLs for a pre-determined period of time is not the same for all IROLs. This standard allows each RA to establish a Tv that is appropriate for each of its IROLs.</p>	
<p>The standard was revised to place responsibility for this requirement on the reliability authority. The reliability authority may use whatever processes or tools it wants to use to determine an appropriate Tv for its IROLs. There is nothing in this standard that would preclude an RA from establishing '30-minutes' as a Tv for all of its IROLs. However, industry comments have indicated a preference for allowing unique Tvs for IROLs because this is less prohibitive to energy markets and may also be a better protector of reliability. There may be technical reasons for establishing Tv at a value other than 30 minutes.</p>	
<p>IROLs are a subset of System Operating Limits and must be developed following a standard methodology as required in the Determine Facility Ratings Standard. Peer review is not currently a requirement in the development of system operating limits.</p>	

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<p>Stuart Goza TVA #1</p>	<p>The statements in sections 1.1.1 and 1.1.2 imply that the Planning Authority Area is the same size as the Reliability Authority Area. Entities that perform planning authority functions may not cover the same geographical area as their respective reliability authorities. The statements should be changed as follows: “The reliability authority and planning authority(ies) shall...”</p> <p>Generally, the Measures should be tied to the Requirements and the Objective Evidence for Compliance (OEC) should be tied to the Measures. This Standard could be improved by formatting (where possible) Measurement 2.1 to relate to Requirement 1.1 and Measurement 2.2 to relate to Requirement 1.2, etc. rather than listing the measures and requirements arbitrarily and independently. In order to tie the OEC’s to the Measures, Section 4 should be clarified to read:</p> <p>4.3. The entity responsible shall have the following Objective Evidence for Compliance available upon the request of its compliance monitor:</p> <ul style="list-style-type: none"> <li>4.3.1. List of interconnection reliability operating limits for the reliability authority’s reliability area <b>as described in Measure 2.1 above</b></li> <li>4.3.2. List of facilities (or groups of facilities) in the reliability authority’s reliability area that are subject to interconnection reliability operating limits <b>as described in Measure 2.2 above</b></li> </ul>
<p><b>The standard was revised to indicate that the reliability authority is the only function that must comply with this requirement.</b></p> <p><b>The suggested format change was not adopted. The standards have been drafted to be as succinct as possible – and the additional words do not add anything to the standard. In addition, when the standards are completed, they will be available to the industry in a relational database with search capabilities. If the suggested cross-referencing were adopted, and someone downloaded a report that listed just the compliance elements for this standard, the cross references would lead the reader to believe that additional information could be found in the measures – and in many cases this is not true.</b></p>	
<p><u>NPCC CP9</u>  Michael Schiavone National Grid USA #1  Roger Champagne Hydro-Quebec TransEnergie #1  Ralph Rufrano New York Power Authority #1  David Little Nova Scotia Power Inc. #1  David Kiguel Hydro One Networks #1  Michael Potishnak ISO-New England #2  Barry Gee National Grid USA #1  Dan Stosick ISO-New England #2  Fernando Saavedra ISO-New England #2  Greg Campoli New York ISO #2</p>	<p>IROL will not always be known ahead of time. An unusual combination of events could create an IROL type event that was unplanned for. Some of the IROL may be time variant so the Compliance Monitoring Process section needs to address this.</p> <p>Regarding levels of compliance it is suggested that less severe levels of non-compliance be associated with incompleteness or inaccuracy of the list. NPCC suggests that compliance with only IROLs for planned system conditions be the requirement.</p>

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<b>The standard was revised to reflect these suggestions.</b>	
<p><u>Southern Co Transmission Planning #1</u>          Todd Lucas Southern Co          Joe Payne Mississippi Power Company          Travis Koval Southern Co          Bill Pope Gulf Power Company          John Clark Southern Co          David Johnson Savannah Electric          Mike Miller Southern Co          Jim Griffith Southern Co          Monroe Landrum Southern Co</p>	<p>Should Transmission Owner be added to this?</p>
<b>Under the Functional Model, the Transmission Owner is responsible for developing Facility Ratings – and the Reliability Authority has responsibility for establishing reliability limits (System Operating Limits and IROLs). In establishing the reliability limits, the RA must respect the facility ratings established by the Transmission Owner.</b>	
<p>Charles Yeung Reliant #5</p>	<p>It is unclear what a “responsible entity” is. Why are the functional model “functions” not specifically referenced in the “Measures” and “Compliance Monitoring Process” sections? Specific functions should be identified to eliminate conflict and dispute</p>
<b>The standard was revised to indicate that the reliability authority is the only entity responsible for this requirement. There are places in this standard where the term, ‘entity responsible’ is used. In these cases, more than one entity may be responsible for complying with the requirement – and a decision was made that the standard would be less cumbersome to read if the term, ‘the entity responsible’ was used rather than listing all the entities that must comply.</b>	
<p>Terry Bilke Midwest ISO #2</p>	<p>Who is ‘the entity responsible’?          It would be preferable to have limits populated in a common database available to all reliability entities so that there’s no miscommunication of limits between PA, TO and RA or misunderstanding of one RA’s impact on another. Also, the RA wouldn’t be hit with a level 4 compliance violation for failing to produce a piece of paper during a site visit.          The Planning Authority is to provide limits used by the RA. The posted functional model has no details on the planning authority. Perhaps the standard should say, the planning authority and/or Transmission Operator.</p>
<b>The standard was revised to indicate that the reliability authority is the only entity responsible for this requirement. There are places in this standard where the term, ‘entity responsible’ is used. In these cases, more than one entity may be responsible for complying with the requirement – and a decision was made that the standard would be less cumbersome to read if the term, ‘the entity responsible’ was used rather than listing all the entities that must comply.</b>	
<p>Susan Morris SERC #2          Bill Reinke SERC #2          Sam Stryker Fayettevill PWC #3, 4, 5          Carter Edge SEPA #4, 5</p>	<p>The statements in sections 1.1.1 and 1.1.2 imply that the Planning Authority Area is the same size as the Reliability Authority Area. Entities that currently perform planning authority functions do not cover the same geographical area as their respective reliability authorities. The statements should be changed as follows: “The reliability authority and planning authority(ies) shall...”</p>

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<p>Bill Thompson Dominion Trans #1</p>	<p>Please see the comment to question (2), above, concerning the TOs responsibility and role with respect to this standard. If the developers of the standard insist on only one functional entity being responsible for this activity, then that functional entity should be the Transmission Owner. However, we view this activity as a shared activity between the TO(s), RA, PA(s), TSP, and TOP(s), and recommend all functional entities be identified in Standard 201 part 1.1 and 1.2.</p> <p>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.</p> <p>Generally, the Measures should be tied to the Requirements and the Objective Evidence for Compliance (OEC) should be tied to the Measures. This Standard could be improved by formatting (where possible) Measurement 2.1 to relate to Requirement 1.1 and Measurement 2.2 to relate to Requirement 1.2, etc. rather than listing the measures and requirements arbitrarily and independently.</p> <p>In order to tie the OEC's to the Measures, Section 4 should be clarified to read:</p> <p>4.3. The entity responsible shall have the following Objective Evidence for Compliance available upon the request of its compliance monitor:</p> <p>4.3.1. List of interconnection reliability operating limits for the reliability authority's reliability area as described in Measure 2.1 above</p> <p>4.3.2. List of facilities (or groups of facilities) in the reliability authority's reliability area that are subject to interconnection reliability operating limits as described in Measure 2.2 above</p>
<p>The standard was revised to indicate that the reliability authority is the only function that must comply with this requirement. Under the Functional Model, each major activity must be assigned to just one function – and the functional model assigns responsibility for establishing reliability –related limits to the Reliability Authority. This does not preclude the RA from working with other entities to develop these limits, and does not preclude the RA from having to respect the facility limits established by the facility owners (Generator Owners and Transmission Owners).</p> <p>The standard was revised to address the concern that limits will need to be changed as system conditions change.</p> <p>The suggested format change was not adopted. The standards have been drafted to be as succinct as possible – and the additional words do not add anything to the standard. In addition, when the standards are completed, they will be available to the industry in a relational database with search capabilities. If the suggested cross-referencing were adopted, and someone downloaded a report that listed just the compliance elements for this standard, the cross references would lead the reader to believe that additional information could be found in the measures – and in many cases this is not true.</p>	
<p>Gerald Rheault Manitoba Hydro #1, 3, 5, 6</p>	<p>Manitoba Hydro believes that it will be very difficult to identify the IROL subset from the SOLs determined for operation of the transmission facilities in the geographical footprint</p>

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	<p>for which the RA has operational responsibility. Any SOL provides protection for the worst contingency, so if the limit is respected, events such as system collapse, cascading loss of lines and other major events are extremely unlikely, unless there are multiple near-simultaneous contingencies. However, most system operating limits (SOL) could lead to significant system disturbances if they are exceeded by a large amount or exceeded for a significant period of time, or both. While any SOL will have been established such that the next contingency should not have any impacts if operation is within the SOL, operation outside of the SOL, accompanied by even one contingency, could lead to cascading loss of lines (thermal limits) or system instability (voltage or angular stability limits). It is Manitoba Hydro's belief that it is very difficult to identify such situations without exhaustive studies on very detailed models.</p> <p>The normal approach for developing system operating limits will likely incorporate some reliability margins for dealing with some of the lack of detail (for example, overcurrent protection is often not modelled, phase shifter action is assumed to occur without being studied at all possible positions) but, if system operation is to be investigated beyond such limits, small details become very important.</p> <p>It is important that NERC instill a culture of respect for limits of all types and values. There is a risk that a focus on the nebulous concept of an IROL will diffuse the respect for all other limits and the frustration of identifying such IROL's will further reduce the number classified as IROL's. NERC should clearly state how IROL's are to be identified and how NERC or the regions can address the other limits which may be important (among other things, the regional standards must either be developed through a separate standards process or flow from a NERC standard – the current proposal does not let the other limits flow from this standard).</p> <p>In item 201.2.1.1 the words at the end of this sentence (that does not already have a T<sub>v</sub>) should be removed.</p>
<p>The concept of identifying a subset of system operating limits that, if exceeded, could lead to 'evil things' is not new. The IRLs currently undergoing field testing are equivalent to the IROLs addressed in this requirement.</p> <p>Several months ago the SDT sent a letter to the Director-Standards recommending that action be taken to review the need for a separate standard that addresses operating within system operating limits. In turn, the Director-Standards informed the NERC Operating Committee (OC) and asked that the OC initiate action to determine if an additional SAR is needed.</p> <p>The recommended change to 201.2.1.1 was made.</p>	
<p><u>FRCC Op, Eng &amp; Mkt Int</u> Linda Campbell FRCC #2 Paul Elwing Lakeland Electric # 3</p>	<p>In 1.2.1 of the requirement, T<sub>v</sub> is called a "response time", but on the definition page it is called a "violation time". Consistency is needed. We did not agree with the measures because the measures state "the entity responsible" which is not specific enough. Who</p>



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<p>John Shaffer FPL #1          Bob Remley Clay Elec Coop #4          Patti Metro FRCC #2          Eirc Grant Progress Energy – FL #1          Joe Roos Ocala Electric Utility #3          Joe Krupar FL Muni Pwr Agency #3          Richard Gilbert Lakeland Electric #3          7. Bill Slater Progress Energy – FL #1          Amy Long Lakeland Electric #1          Roger Westphal Gainesville Regional Util #5          Bob Goss SEPA #5          Steve Wallace Seminore Electric Coop #4          Ted Hobson JEA #1</p>	<p>is the entity responsible? We do not have any problems with the steps of the compliance monitoring process, but again, the phrase "the entity responsible" is used throughout and this should be more specific. We do agree with the intent of the non-compliance level listed in 5.4; however do have a concern that it presumes that all transmission systems will have an IROL. This may not be true for radial systems. Perhaps 5.4 could be reworded as follows, "No documented analysis of possible IROLs or list of facilities subject to IROLs for the RA's reliability area was provided. Finally, Section 6, Sanctions should be removed completely. The compliance monitoring process and non-compliance levels are appropriate parts of the reliability standard. However, the sanctions and penalties are part of the compliance program and are separate. The enforcement matrix should not be attached to this document, even for information only, as that gives the appearance of being part of the standard. The sanctions and penalties, along with the enforcement matrix are the responsibility of the new Compliance and Certification Committee (CCC). If the matrix is attached to the standard, every time the CCC changes it, the standard will need to be revised which is not something we should set ourselves up to do.</p>
<p>The mismatch between the language in the standard and the definition of <math>T_v</math> has been corrected.          The standard was revised to indicate that all of the measures in this requirement must be met by the reliability authority.          If an entity has no IROLs, then its list(s) will be empty.          The levels of non-compliance could not be changed as recommended because the standard does not require that the reliability authority document its analyses conducted to identify IROLs. The analyses conducted to identify IROLs may be done on an ongoing basis, and collecting this documentation would be cumbersome.          The enforcement matrix was attached at the recommendation of NERC's Vice President and Legal Counsel to ensure that reviewers understood the penalty structure.</p>	
<p>Dan Boezio &amp; Raj Rana AEP #1, 3, 5, 6</p>	<ol style="list-style-type: none"> <li>1. In 201.1.2.1 Consider: The Reliability Authority or Planning Authority shall establish a maximum response time (<math>T_v</math>) for all Interconnected Reliability Operating Limits.</li> <li>2. In 201.5.4 "States NO list of Interconnected Reliability Operating Limits or NO list of facilities ....." Should it be "Incomplete" lists?</li> <li>3. Defined terms should be capitalized, such as "Reliability Authority", "Interconnected Reliability Operating Limits", etc.</li> <li>4. Who is the ultimate arbiter of what is the "complete list" of facilities and limits? Should the RA and PA be required to have studies available that support their IROLs or is just having a list of facilities with associated limits enough? If having studies is to be required, then what is the penalty if studies show other facilities should have had an IROL but the RA or PA did not specify a limit for that facility? Is the real concern identifying what facilities have an IROL or is it that we want to ensure that the RA does not operate in violation of identified IROLs? This version of the Standard has requirements for both, but leaves a lot of unanswered</li> </ol>

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	<p>questions.</p> <p>5. 201.1.1: How will the Reliability Authority and Planning Authority identify and document the facilities subject to operating limits jointly? What is the course of action if there is disagreement? Which functional entity has the final say? We believe the Standard should specify only one entity to be ultimately responsible. For this requirement we suggest it should be the RA. Suggested rewording: “The Reliability Authority in coordination with the Planning Authority shall identify and document . . .”</p> <p>201.1.2: Suggested rewording: “The Reliability Authority in coordination with the Planning Authority shall identify . . .”</p> <p>201.1.2.1: Suggested rewording: “The Reliability Authority in coordination with the Planning Authority shall identify a maximum . . .”</p> <p>6. 201.4.2: We believe the performance-reset period should be 12 months from the date of the infraction not one calendar year.</p> <p>7. 201.5 Levels of Non-compliance: We disagree with the SDT’s perspective that there is no gray area where partial credit is appropriate. Requirement 201 is a documentation and communication requirement, The RA needs to have documented IROLs and have such documentation of limits available to the RA system operators. As such this requirement is similar to the communication requirements 602, 604, and 606 in the “Determine Facility Ratings, System Operating Limits, and Transfer Capabilities Standard.” In those requirements, it is proposed that there be multiple levels of non-compliance. We believe that is prudent and should be the case with this requirement too. As presently stated, if an RA has an incomplete list of IROLs or incomplete list of facilities requiring IROLs, he is still compliant. The RA is only non-compliant if they have “no list.” We believe this is too lenient. We suggest that the levels of non-compliance should address both completeness (all identified facilities have associated IROL and T<sub>v</sub> value) and quality (all appropriate facilities have been identified and the limits and T<sub>v</sub> values are reasonable).</p>
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<ol style="list-style-type: none"> <li>1. 201.1.2.1 was changed to: The reliability authority shall identify a T<sub>v</sub> for each interconnection reliability operating limit. This supports the intent of your recommended change, but also respects the comments of others who indicated the RA should be the only function assigned this responsibility.</li> <li>2. 201.5.4 was not changed to 'incomplete list' because this would be very difficult to measure objectively. Some entities have programs that run in real time to keep this list as up to date as possible, while other entities update the list through more manual processes. The standard was changed to require that the lists be updated and that entities have evidence that the lists were updated.</li> <li>3. The suggestion that defined terms be capitalized has been adopted and is reflected in the revised standard.</li> <li>4. The standard does not require that entities have a 'complete' list because this would be very difficult to measure. In addition, some entities have programs that run in real time to keep this list as up to date as possible, while other entities update the list through more manual processes. Requiring that analyses be documented could be unwieldy for entities that use automated processes.</li> <li>5. 201.1.1, 201.1.2, 201.1.2.1– The standard was revised to clarify that the Reliability Authority is the only function with responsibility for this requirement and its associated measures. The RA may work with other functions such as the Planning Authority in developing the limits, but the RA has ultimate responsibility for the limits being developed.</li> <li>6. There were several commenters who suggested changes to the reset period, and the standard was revised so that all requirements in this standard have the following language: "12 months from the last violation" This change supports your recommendation.</li> <li>7. The levels of non-compliance were adjusted to give partial credit for lists that were developed but hadn't been updated. Given the dynamic nature of IROLs, it would be very difficult to objectively measure 'incomplete' lists.</li> </ol>	
<p>Tom Pruitt Duke Power #1</p>	<p>Reword measures to state what is measured and to refer to the associated requirements. Section 201.5.3 should read "List exists, but is not complete or lacks technical merit (is not good utility practice)."</p>
<p>The suggested change was not made because determining whether a list is incomplete or lacks technical merit may be difficult or impossible to measure. The standard was modified to require that the lists be updated and to require that the RA have evidence that the lists were updated – and a level three non-compliance was added to give partial credit to RAs who have lists but haven't updated them. This may be equivalent to having an 'incomplete' list.</p>	
<p><u>Operating Reliability Working Group SPP</u>          Gerry Burrows KCP&amp;L #1          Bob Cochran SPS #1          Peter Kuebeck OG&amp;E #1          Scott Moore AEP #1          Tom Stuchlik Westar #1          Dan Boezio AEP #1          Matt Bordelon CLECO #1          Mike Crouch WFEC #1</p>	<ol style="list-style-type: none"> <li>1. It is very cumbersome and can often times be very confusing when two entities are given responsibility for the same task. The requirements outlined in 1.1, 1.2 and 1.1.2 call for both the reliability authority and the planning authority to identify the facilities that have IROLs and also to identify the IROL. We suggest that the reliability authority should be ultimately responsible for identifying and quantifying the IROLs since these are operating limits. However, the reliability authority should thoroughly coordinate this effort with the planning authority. Wording such as "The reliability authority shall coordinate with the planning authority to identify..." would be better. Following this line of thought with the measures in 2.1, 2.1.1 and 2.2, wording should be changed to reflect the reliability authority's ultimate responsibility.</li> </ol>

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<p>Mike Gammon KCP&amp;L #1 Kevin Goolsby SPP #2 Bo Jones Westar #1 Allen Klassen Westar #1 Thad Ness AEP #1 Harold Wyble KCP&amp;L #1 Robert Rhodes SPP #2</p>	<p>“The reliability authority entity shall establish...” makes a better fit.</p> <ol style="list-style-type: none"> <li>The performance reset period should be changed to 12 months rather than one calendar year.</li> <li>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.</li> </ol>
<ol style="list-style-type: none"> <li>Several commenters indicated that the RA should be the only function responsible for this requirement, and that change was made to the standard. It is still unclear as to what duties, if any, will be assigned to the Planning Authority, and the SDT elected to omit specific references to the Planning Authority in this standard.</li> <li>There were several commenters who suggested changes to the reset period, and the standard was revised so that all requirements in this standard have the following language: “12 months from the last violation” This change supports your recommendation.</li> <li>Several commenters indicated a need to add more levels of non-compliance, and to address ‘partial credit’ for incomplete lists. Consequently, the standard was modified to require that the lists be updated and to require that the RA have evidence that the lists were updated – and a level three non-compliance was added to give partial credit to RAs who have lists but haven’t updated them. This may be equivalent to having an ‘incomplete’ list. With respect to the appropriateness of levels of non-compliance for documentation - the SDT is only working on this standard, and doesn’t have the authority to control what is included in other standards.</li> </ol>	
<p><u>Southern Co Transmission Planning</u> Todd Lucas Southern Co #1 Joe Payne Mississippi Pwr Co #3 Travis Koval Southern Co #1 Bill Pope Gulf Pwr Co #3 John Clark Southern Co #1 David Johnson Savannah Electric #3</p>	<p>The Transmission Owner should be added to this requirement if they can be held liable for violating IROL's.</p>
<p>The Transmission Owner is responsible for establishing facility ratings for its facilities – and that is addressed in the Determine Facility Ratings, System Operating Limits and Transfer Capabilities standard. The reliability authority is the only function responsible for Requirement 201.</p>	
<p><u>MAAP Ops Subcommittee #2</u> Llyod Linke MAPP Allan Silk Manitoba Hydro Paul Brune NPPD Tod Gosnell Omaha Public Pwr Dist Paul Koskela Minnesota Pwr</p>	<p>The requirement to produce a list of IROLs must include the notion that if the failure to identify an existing IROL results in the system experiencing cascading outages, instability, or uncontrolled separation - a consequence occurs. The requirement, as written, provides no monitoring or non-compliance provisions for the failure to properly identify an IROL – an entity is compliant if they have a list of one IROL – even if in the last year they caused multiple bulk reliability catastrophes due to not identifying other IROLs on their system.</p>

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<p>Larry Larson Otter Tail Power  Derrick Moe WAPA  Dick Pursley Great River Energy  Martin Trency Xcel Energy  Joseph Knight MAPPCOR</p>	<p>The order of 2.1 and 2.2 should be swapped to agree with 1.1 and 1.2 order.</p>
<p>These new standards are being developed so that there should be only a single sanction for a single infraction. If an entity violates an IROL for time greater than the IROL's <math>T_v</math>, then that entity will be sanctioned for that infraction under requirement 204. Requirement 201 was revised to indicate that the lists must be updated, and an additional level of non-compliance was added to address situations where entities do not update their lists. It would be very difficult for a compliance monitor to make judgements about the technical accuracy or completeness of any entity's lists.</p> <p>The recommended reorganization of the measures was adopted and is reflected in the revised standard.</p>	
<p><u>BPA Adm TBL #1</u>  James Murphy Mike Viles  James Randall Al Johnson  Jeff Newby Jim Gronquist  Sylvia Wiggerhaus Brian Tuck  Dick Spence Tracy Rolstad  Steve Hitchens</p>	<p>Should remove planning authority to obtain a single point of responsibility. Also, Remove maximum response time and use just <math>T_v</math>, this will apply to the entire definition associated with <math>T_v</math>.</p>
<p>Both of the recommended changes were adopted and are reflected in the revised standard.</p>	
<p>Darrell Richardson Illinois Power #1, 3</p>	<p>We agree with the current list but wonder if their should be a category for an "incomplete list".</p>
<p>Several commenters indicated a need to add more levels of non-compliance, and to address 'partial credit' for incomplete lists. Consequently, the standard was modified to require that the lists be updated and to require that the RA have evidence that the lists were updated – and a level three non-compliance was added to give partial credit to RAs who have lists but haven't updated them. This may be equivalent to having an 'incomplete' list.</p>	
<p>Ed Davis Entergy Services #1</p>	<p>Please see the comment to question (2), above, concerning the TOs responsibility and role with respect to this standard. If the developers of the standard insist on only one functional entity being responsible for this activity, then that functional entity should be the Transmission Owner. However, we view this activity as a shared activity between the TO, RA, PA, TSP, and TOP, and recommend all functional entities be identified in Standard 201 part 1.1 and 1.2.</p> <p>Standard 201 part 1.2.1 should have the "RA or PA" replaced with the "Transmission Owner or Transmission Operator" as the functional entities responsible for establishing the maximum response time (<math>T_v</math>) for any IROL that does not already have one.</p>

**Draft Comments and Considerations for 2<sup>nd</sup> Posting for Operate Within IROLs Standard Requirement 201 – IROL Identification**

	<p>In the measures sections 2.1 and 2.2, replace the “entity responsible” with the “TO, RA, PA, TSP, and TOP” as the entities establishing a list of IROLs.</p> <p>Measures section 2.1.1 should have the “entity responsible” replaced with the “TO” being responsible for establishing the maximum value of Tv.</p> <p>In the Compliance Monitoring Process section, the “entity responsible” should be replaced with the “Transmission Owner” in each occurrence of that term.</p>
<p>The Determine Facility Ratings, System Operating Limits and Transfer Capabilities Standard addresses the development of both facility ratings and system operating limits. That standard requires that the equipment owners establish facility ratings, and that the facility ratings be respected in the development of system operating limits.</p> <p>The Functional Model assigns responsibility for establishing facility ratings to equipment owners (Generator Owners and Transmission Owners) – and assigns the responsibility for establishing reliability limits to the RA and limits associated with local networks to the TOP.</p> <p>The Functional Model does not preclude the delegation of activities from the RA to other functions. However, the Functional Model is built on the assumption that there is one function with ultimate responsibility for each reliability-related activity, and the Functional Model assigns the RA the responsibility for establishing reliability limits. The RA can delegate this responsibility to TOPs, but even if the RA delegates this responsibility, the RA would be held responsible for compliance with the requirement. The SDT was also concerned about completely removing the requirements for the TOP, and sent a letter to the Director-Standards recommending that action be taken to review the need for a separate standard that addresses operating within system operating limits. In turn, the Director-Standards informed the NERC Operating Committee (OC) and asked that the OC initiate action to determine if an additional SAR is needed.</p>	
<p><u>SERC Operations Planning Subcommittee</u>  Carter Edge SEPA #4, 5  William Gaither So Carolina Pub Serv Auth #1  Mike Miller Southern Co #1  Roger Brand Muni Elec Auth GA #1  Phil Creech Progress Energy – CP&amp;L #1  Gene Delk So Carolina Elec &amp; Gas #1  Al McMeekin So Carolina Elec &amp; Gas #1  Greg Ott Alcoa-Yadkin #1  Doug Newbaue GA System Operations #1  Mike Clements TVA #1  Don Reichenbach Duke Energy #1  Lynna Estep SERC #2  Mark Creech TVA #1</p>	<ol style="list-style-type: none"> <li>8. 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.</li> <li>9. Who determines T<sub>v</sub> and what restrictions are placed on the entity establishing it?</li> <li>10. Generally, the Measures should be tied to the Requirements and the Objective Evidence for Compliance (OEC) should be tied to the Measures. This Standard could be improved by formatting (where possible) Measurement 2.1 to relate to Requirement 1.1 and Measurement 2.2 to relate to Requirement 1.2, etc. rather than listing the measures and requirements arbitrarily and independently.</li> <li>11. In order to tie the OEC’s to the Measures, Section 4 should be clarified to read:</li> <li>12. The entity responsible shall have the following Objective Evidence for Compliance available upon the request of its compliance monitor:</li> <li>13. List of interconnection reliability operating limits for the reliability authority’s reliability area <b>as described in Measure 2.1 above</b></li> </ol>

**Draft Comments and Considerations for 2<sup>nd</sup> Posting for Operate Within IROLs Standard Requirement 201 – IROL Identification**

	<p><b>14.</b> 4.3.2. List of facilities (or groups of facilities) in the reliability authority's reliability area that are subject to interconnection reliability operating limits <b>as described in Measure 2.2 above</b></p>
<p>The standard was revised to indicate that the lists must be updated, but the standard does not include a provision for the compliance monitor to assess the 'quality' of the lists. Some IROLs are updated through studies, and others are updated as operating conditions change on a minute-to-minute basis.</p> <p>The reliability authority establishes the T<sub>v</sub> component of the IROL. The standard was revised to state this more clearly.</p> <p>The suggested format change was not adopted. The standards have been drafted to be as succinct as possible – and the additional words do not add anything to the standard. In addition, when the standards are completed, they will be available to the industry in a relational database with search capabilities. If the suggested cross-referencing were adopted, and someone downloaded a report that listed just the compliance elements for this standard, the cross references would lead the reader to believe that additional information could be found in the measures – and in many cases this is not true.</p>	
<p>Alan Johnson Mirant Americas Energy Mktg #6</p>	<p>Don't understand why the standard references the Planning Authority and "entity responsible. Isn't the Reliability Authority the function ultimately responsible for determining IROLs?</p> <p>Also believe that section 1.2.1 should be revised to read: "The reliability authority shall identify a maximum response time (T<sub>v</sub>) for all interconnection reliability operating limits within its reliability area." Regarding the levels of non-compliance, believe there should be a level (level 3?) for a partial list of IROLs.</p>
<p>The standard was revised to clearly indicate that the reliability authority is the only function with responsibility for this requirement.</p> <p>Requirement 1.2.1 was revised as follows: The reliability authority shall identify a T<sub>v</sub> for each interconnection reliability operating limit. Several commenters indicated that including "T<sub>v</sub>" and the phrase, "maximum response time" was redundant.</p> <p>Several commenters indicated a need to add more levels of non-compliance, and to address 'partial credit' for incomplete lists. Consequently, the standard was modified to require that the lists be updated and to require that the RA have evidence that the lists were updated – and a level three non-compliance was added to give partial credit to RAs who have lists but haven't updated them. This may be equivalent to having an 'incomplete' list.</p>	
<p><u>Southern Company Generation &amp; Energy Mktg</u>          Roman Carter # 5, 6          Joel Dison #5,6          Tony Reed #5,6          Lucius Burris #5,6          David Deerman #5,6          Clifford Shepard #5,6          Michael Smith #5,6</p>	<p>The Transmission Owner should be added to 201 1.1.1 and 201 1.2.1.</p>

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<p>Lloyd Barnes SCGEM 5,6          Gary Miller SCGEM 5,6          Terry Crawley Southern Generation 5          Roger Green Southern Generation 5</p>	
<p>The Determine Facility Ratings, System Operating Limits and Transfer Capabilities Standard addresses the development of both facility ratings and system operating limits. That standard requires that the equipment owners establish facility ratings, and that the facility ratings be respected in the development of system operating limits.</p> <p>The Functional Model assigns responsibility for establishing facility ratings with equipment owners (Generator Owners and Transmission Owners) – and assigns the responsibility for establishing reliability limits to the RA and limits associated with local networks to the TOP.</p> <p>The Functional Model does not preclude the delegation of activities from the RA to other functions. However, the Functional Model is built on the assumption that there is one function with ultimate responsibility for each reliability-related activity, and the Functional Model assigns the RA the responsibility for establishing reliability limits. The RA can delegate this responsibility to TOPs, but even if the RA delegates this responsibility, the RA would be held responsible for compliance with the requirement. The SDT was also concerned about completely removing the requirements for the TOP, and sent a letter to the Director-Standards recommending that action be taken to review the need for a separate standard that addresses operating within system operating limits. In turn, the Director-Standards informed the NERC Operating Committee (OC) and asked that the OC initiate action to determine if an additional SAR is needed.</p>	
<p>Kathleen Goodman ISO-NE #2</p>	<p>ISO New England does not believe that we should identify specific limits which must be reported on. Rather, we advocate internally reporting on every violation which does not clear within 30 minutes (as defined in NERC policy). Subsequently, each reported violation will be studied/examined to see if it would have caused instability, uncontrolled separation, or cascading outages that adversely impact the reliability of the bulk power transmission system (have an Inter-Area impact outside of the New England Area following next contingency). If so, ISO New England would report this "OSL violation" to NPCC and NERC within 72 hours. If there would not have been an Inter-Area impact (i.e. the impact would have been localized within the offending Control Area's boundary), no external reporting will occur. We suggest this approach be adopted.</p> <p>By restricting reporting to pre-identified limits, NERC may not be getting the information they seek through this Standard. Only through a post-operational assessment, can a true analysis (with the correct system configuration) be performed and an adequate judgement be made on the potential impact to the bulk power system.</p> <p>We also believe that data should not be archived unless the limit is not cleared within 30 minutes. We do not advocate archiving data for every limit violation if it cleared in less than 30 minutes.</p>



## Draft Comments and Considerations for 2<sup>nd</sup> Posting for Operate Within IROLs Standard Requirement 201 – IROL Identification

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This standard is based on the assumption that while all system operating limits are important, a subset of limits is most critical to the reliability of the interconnection, and exceeding these limits could lead to voltage instability, cascading outages, or uncontrolled separation. By identifying these limits in advance, system operators can pay extra attention to these limits, and can be better prepared to take (or direct) actions to prevent and mitigate instances of exceeding these limits. Some of these limits really shouldn't be exceeded for 30 minutes – and that is one of the reasons why the industry supported modifying the language that is in current Operating Policy, and allowing each RA to establish a  $T_v$  that is most appropriate to each limit.

The decision on whether or not to report an instance of exceeding an IROL is based on the length of time the IROL was exceeded. Lists of IROLs are not expected to remain static – these must be updated to conform with changes to the system.

This requirement is addressing the identification of IROLs and doesn't have anything to do with real-time performance in exceeding one of those IROLs. When an IROL is exceeded, the documentation required is that which is typically found on the system operations log, and shouldn't require any additional effort to develop. Many entities keep operations logs for an indefinite period of time – and this standard requires keeping the data for just 3 years to ensure that there is some data on site when the Compliance Monitor conducts a scheduled audit once every 3 years.

**Draft Comments and Considerations for 2<sup>nd</sup> Posting for Operate Within IROLs Standard Requirement 202 - Monitoring**

**Requirement 202 - Monitoring - Do you agree with the requirement?**

Commenter	Yes	No	Comments
Kathleen Goodman ISO-NE #2	x		
Terry Bilke Midwest ISO #2	x		
Ken Githens Allegheny Energy Supply #5	x		
William Smith Allegheny Power #1	x		
<u>NPCC CP9</u> Michael Schiavone National Grid USA #1 Roger Champagne Hydro-Quebec TransEnergie #1 Ralph Rufrano New York Power Authority #1 David Little Nova Scotia Power Inc. #1 David Kiguel Hydro One Networks #1 Michael Potishnak ISO-New England #2 Barry Gee National Grid USA #1 Dan Stosick ISO-New England #2 Fernando Saavedra ISO-New England #2 Greg Campoli New York ISO #2	x		
Peter Burke ATC #1	x		
Charles Yeung Reliant #5	x		
Gerald Rheault Manitoba Hydro #1, 3, 5, 6	x		
<u>FRCC Op, Eng &amp; Mkt Int</u> Linda Campbell FRCC #2 Paul Elwing Lakeland Electric # 3 John Shaffer FPL #1 Bob Remley Clay Elec Coop #4 Patti Metro FRCC #2 Eirc Grant Progress Energy – FL #1 Joe Roos Ocala Electric Utility #3 Joe Krupar FL Muni Pwr Agency #3 Richard Gilbert Lakeland Electric #3 Bill Slater Progress Energy – FL #1 Amy Long Lakeland Electric #1 Roger Westphal Gainesville Regional Util #5 Bob Goss SEPA #5	x		

**Draft Comments and Considerations for 2<sup>nd</sup> Posting for Operate Within IROLs Standard Requirement 202 - Monitoring**

Steve Wallace Seminore Electric Coop #4 Ted Hobson JEA #1			
Alan Boesch NPPD #1	x		
Dan Boezio & Raj Rana AEP #1, 3, 5, 6	x		
Raymond Mammarella PPL Elec Util #1	x		
Tom Pruitt Duke Power #1	x		
Tony Jankowski We Energies #4	x		
Michael Sidiropoulos Pacificorp	x		
<u>Operating Reliability Working Group SPP</u> Gerry Burrows KCP&L #1 Bob Cochran SPS #1 Peter Kuebeck OG&E #1 Scott Moore AEP #1 Tom Stuchlik Westar #1 Dan Boezio AEP #1 Matt Bordelon CLECO #1 Mike Crouch WFECC #1 Mike Gammon KCP&L #1 Kevin Goolsby SPP #2 Bo Jones Westar #1 Allen Klassen Westar #1 Thad Ness AEP #1 Harold Wyble KCP&L #1 Robert Rhodes SPP #2	x		
Robert Grover PPL Elec Util #3	x		
MAAP Ops Subcommittee #2 Llyod Linke MAPP Allan Silk Manitoba Hydro Paul Brune NPPD Tod Gosnell Omaha Public Pwr Dist Paul Koskela Minnesota Pwr Larry Larson Otter Tail Power Derrick Moe WAPA Dick Pursley Great River Energy	x		

**Draft Comments and Considerations for 2<sup>nd</sup> Posting for Operate Within IROLs Standard Requirement 202 - Monitoring**

Martin Trencé Xcel Energy Joseph Knight MAPPCOR			
John Horakh MAAC #2	x		
<u>BPA Adm TBL #1</u> James Murphy Mike Viles James Randall Al Johnson Jeff Newby Jim Gronquist Sylvia Wiggerhaus Brian Tuck Dick Spence Tracy Rolstad Steve Hitchens	x		
Darrell Richardson Illinois Power #1, 3	x		
David Thorne Pepco #1	x		
<u>SERC Operations Planning Subcommittee</u> Carter Edge SEPA #4, 5 William Gaither So Carolina Pub Serv Auth #1 Mike Miller Southern Co #1 Roger Brand Muni Elec Auth GA #1 Phil Creech Progress Energy – CP&L #1 Gene Delk So Carolina Elec & Gas #1 Al McMeekin So Carolina Elec & Gas #1 Greg Ott Alcoa-Yadkin #1 Doug Newbaue GA System Operations #1 Mike Clements TVA #1 Don Reichenbach Duke Energy #1 Lynna Estep SERC #2 Mark Creech TVA #1	x		
Albert DiCaprio MAAC #2	x		
Alan Johnson Mirant Americas Energy Mktg #6	x		
Mark Heimbach PPL Generation #6	x		
<u>Centerpoint Energy #1</u> Richard Sikes John Jonte Wayne Kemper Glenn Hemperley	x		

**Draft Comments and Considerations for 2<sup>nd</sup> Posting for Operate Within IROLs Standard Requirement 202 - Monitoring**

Brad Calhoun			
<u>Trans Subcommittee</u> Robert E. Reed PJM Daniel Cooper Michigan Public Power Agency Ken Donohoo ERCOT Michael Gildea Duke-Energy, North America Francis Halpin Bonneville Power Administration Tom Mallinger Midwest ISO Darrick Moe Western Area Power Adm Scott Moore American Electric Power Bill Slater Florida Power Corporation Tom Stuchlik Western Resources Joseph Stysliger Southern Company David Thorne D. H. Thorne Consultants, Inc Robert Waldele New York ISO Roman Carter Southern Company John Ahr Alleghany Power Systems Susan Morris SERC Ed Pfeiffer Ameren Ray Palmieri ECAR Tom Vandervort NERC	x		
Stuart Goza TVA #1		x	
<u>Southern Co Transmission Planning #1</u> Todd Lucas Southern Co Joe Payne Mississippi Power Company Travis Koval Southern Co Bill Pope Gulf Power Company John Clark Southern Co David Johnson Savannah Electric Mike Miller Southern Co Jim Griffith Southern Co Monroe Landrum Southern Co		x	
Susan Morris SERC #2 Bill Reinke SERC #2 Sam Stryker Fayettevill PWC #3, 4, 5		x	

**Draft Comments and Considerations for 2<sup>nd</sup> Posting for Operate Within IROLs Standard Requirement 202 - Monitoring**

Carter Edge SEPA #4, 5 Bill Thompson Dominion Trans #1			
<u>Southern Company Generation &amp; Energy Mktg</u> Roman Carter # 5, 6 Joel Dison #5,6 Tony Reed #5,6 Lucius Burris #5,6 David Deerman #5,6 Clifford Shepard #5,6 Michael Smith #5,6 Lloyd Barnes SCGEM 5,6 Gary Miller SCGEM 5,6 Terry Crawley Southern Generation 5 Roger Green Southern Generation 5		x	
<u>Southern Co Transmission Planning</u> Todd Lucas Southern Co #1 Joe Payne Mississippi Pwr Co #3 Travis Koval Southern Co #1 Bill Pope Gulf Pwr Co #3 John Clark Southern Co #1 David Johnson Savannah Electric #3		x	
Ed Davis Entergy Services #1		x	

**Draft Comments and Considerations for 2<sup>nd</sup> Posting for Operate Within IROLs Standard Requirement 202 - Monitoring**

**Requirement 202 - Monitoring - Do you agree with the measures?**

Commenter	Yes	No	Comments
Kathleen Goodman ISO-NE #2	x		
Terry Bilke Midwest ISO #2	x		
Ken Githens Allegheny Energy Supply #5	x		
William Smith Allegheny Power #1	x		
Stuart Goza TVA #1	x		
<u>NPCC CP9</u> Michael Schiavone National Grid USA #1 Roger Champagne Hydro-Quebec TransEnergie #1 Ralph Rufrano New York Power Authority #1 David Little Nova Scotia Power Inc. #1 David Kiguel Hydro One Networks #1 Michael Potishnak ISO-New England #2 Barry Gee National Grid USA #1 Dan Stosick ISO-New England #2 Fernando Saavedra ISO-New England #2 Greg Campoli New York ISO #2	x		
<u>Southern Co Transmission Planning #1</u> Todd Lucas Southern Co Joe Payne Mississippi Power Company Travis Koval Southern Co Bill Pope Gulf Power Company John Clark Southern Co David Johnson Savannah Electric Mike Miller Southern Co Jim Griffith Southern Co Monroe Landrum Southern Co	x		
Peter Burke ATC #1	x		
Charles Yeung Reliant #5	x		
Gerald Rheault Manitoba Hydro #1, 3, 5, 6	x		
Alan Boesch NPPD #1	x		
Dan Boezio & Raj Rana AEP #1, 3, 5, 6	x		
Raymond Mammarella PPL Elec Util #1	x		
Tom Pruitt Duke Power #1	x		

**Draft Comments and Considerations for 2<sup>nd</sup> Posting for Operate Within IROLs Standard Requirement 202 - Monitoring**

Michael Sidiropoulos Pacificorp	x		
<u>Operating Reliability Working Group SPP</u> Gerry Burrows KCP&L #1 Bob Cochran SPS #1 Peter Kuebeck OG&E #1 Scott Moore AEP #1 Tom Stuchlik Westar #1 Dan Boezio AEP #1 Matt Bordelon CLECO #1 Mike Crouch WFECC #1 Mike Gammon KCP&L #1 Kevin Goolsby SPP #2 Bo Jones Westar #1 Allen Klassen Westar #1 Thad Ness AEP #1 Harold Wyble KCP&L #1 Robert Rhodes SPP #2	x		
Robert Grover PPL Elec Util #3	x		
<u>Southern Co Transmission Planning</u> Todd Lucas Southern Co #1 Joe Payne Mississippi Pwr Co #3 Travis Koval Southern Co #1 Bill Pope Gulf Pwr Co #3 John Clark Southern Co #1 David Johnson Savannah Electric #3	x		
<u>MAAP Ops Subcommittee #2</u> Llyod Linke MAPP Allan Silk Manitoba Hydro Paul Brune NPPD Tod Gosnell Omaha Public Pwr Dist Paul Koskela Minnesota Pwr Larry Larson Otter Tail Power Derrick Moe WAPA Dick Pursley Great River Energy	x		



**Draft Comments and Considerations for 2<sup>nd</sup> Posting for Operate Within IROLs Standard Requirement 202 - Monitoring**

Martin Trencé Xcel Energy Joseph Knight MAPPCOR			
John Horakh MAAC #2	x		
<u>BPA Adm TBL #1</u> James Murphy Mike Viles James Randall Al Johnson Jeff Newby Jim Gronquist Sylvia Wiggerhaus Brian Tuck Dick Spence Tracy Rolstad Steve Hitchens	x		
Darrell Richardson Illinois Power #1, 3	x		
David Thorne Pepco #1	x		
<u>SERC Operations Planning Subcommittee</u> Carter Edge SEPA #4, 5 William Gaither So Carolina Pub Serv Auth #1 Mike Miller Southern Co #1 Roger Brand Muni Elec Auth GA #1 Phil Creech Progress Energy – CP&L #1 Gene Delk So Carolina Elec & Gas #1 Al McMeekin So Carolina Elec & Gas #1 Greg Ott Alcoa-Yadkin #1 Doug Newbaue GA System Operations #1 Mike Clements TVA #1 Don Reichenbach Duke Energy #1 Lynna Estep SERC #2 Mark Creech TVA #1	x		
Albert DiCaprio MAAC #2	x		
Alan Johnson Mirant Americas Energy Mktg #6	x		
Mark Heimbach PPL Generation #6	x		
<u>Centerpoint Energy #1</u> Richard Sikes John Jonte Wayne Kemper Glenn Hemperley	x		

**Draft Comments and Considerations for 2<sup>nd</sup> Posting for Operate Within IROLs Standard Requirement 202 - Monitoring**

Brad Calhoun			
<u>Trans Subcommittee</u> Robert E. Reed PJM Daniel Cooper Michigan Public Power Agency Ken Donohoo ERCOT Michael Gildea Duke-Energy, North America Francis Halpin Bonneville Power Administration Tom Mallinger Midwest ISO Darrick Moe Western Area Power Adm Scott Moore American Electric Power Bill Slater Florida Power Corporation Tom Stuchlik Western Resources Joseph Styslinger Southern Company David Thorne D. H. Thorne Consultants, Inc Robert Waldele New York ISO Roman Carter Southern Company John Ahr Alleghany Power Systems Susan Morris SERC Ed Pfeiffer Ameren Ray Palmieri ECAR Tom Vandervort NERC	x		
<u>Southern Company Generation &amp; Energy Mktg</u> Roman Carter # 5, 6 Joel Dison #5,6 Tony Reed #5,6 Lucius Burris #5,6 David Deerman #5,6 Clifford Shepard #5,6 Michael Smith #5,6 Lloyd Barnes SCGEM 5,6 Gary Miller SCGEM 5,6 Terry Crawley Southern Generation 5 Roger Green Southern Generation 5	x		
<u>FRCC Op, Eng &amp; Mkt Int</u>	x	x	

**Draft Comments and Considerations for 2<sup>nd</sup> Posting for Operate Within IROLs Standard Requirement 202 - Monitoring**

Linda Campbell FRCC #2 Paul Elwing Lakeland Electric # 3 John Shaffer FPL #1 Bob Remley Clay Elec Coop #4 Patti Metro FRCC #2 Eirc Grant Progress Energy – FL #1 Joe Roos Ocala Electric Utility #3 Joe Krupar FL Muni Pwr Agency #3 Richard Gilbert Lakeland Electric #3 Bill Slater Progress Energy – FL #1 Amy Long Lakeland Electric #1 Roger Westphal Gainesville Regional Util #5 Bob Goss SEPA #5 Steve Wallace Seminore Electric Coop #4 Ted Hobson JEA #1			
Susan Morris SERC #2 Bill Reinke SERC #2 Sam Stryker Fayettevill PWC #3, 4, 5 Carter Edge SEPA #4, 5 Bill Thompson Dominion Trans #1		x	
Ed Davis Entergy Services #1		x	
Tony Jankowski We Energies #4		x	2.3 Add in Real Time
The suggested change was implemented and is reflected in the revised standard.			

**Draft Comments and Considerations for 2<sup>nd</sup> Posting for Operate Within IROLs Standard Requirement 202 - Monitoring**

**Requirement 202 - Monitoring - Do you agree with the compliance monitoring process?**

Commenter	Yes	No	Comments
Terry Bilke Midwest ISO #2	x		
Ken Githens Allegheny Energy Supply #5	x		
William Smith Allegheny Power #1	x		
<u>NPCC CP9</u> Michael Schiavone National Grid USA #1 Roger Champagne Hydro-Quebec TransEnergie #1 Ralph Rufrano New York Power Authority #1 David Little Nova Scotia Power Inc. #1 David Kiguel Hydro One Networks #1 Michael Potishnak ISO-New England #2 Barry Gee National Grid USA #1 Dan Stosick ISO-New England #2 Fernando Saavedra ISO-New England #2 Greg Campoli New York ISO #2	x		
<u>Southern Co Transmission Planning #1</u> Todd Lucas Southern Co Joe Payne Mississippi Power Company Travis Koval Southern Co Bill Pope Gulf Power Company John Clark Southern Co David Johnson Savannah Electric Mike Miller Southern Co Jim Griffith Southern Co Monroe Landrum Southern Co	x		
Peter Burke ATC #1	x		
Charles Yeung Reliant #5	x		
Gerald Rheault Manitoba Hydro #1, 3, 5, 6	x		
<u>FRCC Op, Eng &amp; Mkt Int</u> Linda Campbell FRCC #2 Paul Elwing Lakeland Electric # 3 John Shaffer FPL #1 Bob Remley Clay Elec Coop #4 Patti Metro FRCC #2	x		

**Draft Comments and Considerations for 2<sup>nd</sup> Posting for Operate Within IROLs Standard Requirement 202 - Monitoring**

Eirc Grant Progress Energy – FL #1 Joe Roos Ocala Electric Utility #3 Joe Krupar FL Muni Pwr Agency #3 Richard Gilbert Lakeland Electric #3 Bill Slater Progress Energy – FL #1 Amy Long Lakeland Electric #1 Roger Westphal Gainesville Regional Util #5 Bob Goss SEPA #5 Steve Wallace Seminore Electric Coop #4 Ted Hobson JEA #1			
Raymond Mammarella PPL Elec Util #1	x		
Tom Pruitt Duke Power #1	x		
Tony Jankowski We Energies #4	x		
Michael Sidiropoulos Pacificorp	x		
Robert Grover PPL Elec Util #3	x		
<u>Southern Co Transmission Planning</u> Todd Lucas Southern Co #1 Joe Payne Mississippi Pwr Co #3 Travis Koval Southern Co #1 Bill Pope Gulf Pwr Co #3 John Clark Southern Co #1 David Johnson Savannah Electric #3	x		
<u>MAAP Ops Subcommittee #2</u> Llyod Linke MAPP Allan Silk Manitoba Hydro Paul Brune NPPD Tod Gosnell Omaha Public Pwr Dist Paul Koskela Minnesota Pwr Larry Larson Otter Tail Power Derrick Moe WAPA Dick Pursley Great River Energy Martin Trencle Xcel Energy Joseph Knight MAPPCOR	x		
John Horakh MAAC #2	x		

**Draft Comments and Considerations for 2<sup>nd</sup> Posting for Operate Within IROLs Standard Requirement 202 - Monitoring**

<u>BPA Adm TBL #1</u> James Murphy Mike Viles James Randall Al Johnson Jeff Newby Jim Gronquist Sylvia Wiggerhaus Brian Tuck Dick Spence Tracy Rolstad Steve Hitchens	x		
Darrell Richardson Illinois Power #1, 3	x		
David Thorne Pepco #1	x		
Albert DiCaprio MAAC #2	x		
Alan Johnson Mirant Americas Energy Mktg #6	x		
Mark Heimbach PPL Generation #6	x		
<u>Centerpoint Energy #1</u> Richard Sikes John Jonte Wayne Kemper Glenn Hemperley Brad Calhoun	x		
<u>Trans Subcommittee</u> Robert E. Reed PJM Daniel Cooper Michigan Public Power Agency Ken Donohoo ERCOT Michael Gildea Duke-Energy, North America Francis Halpin Bonneville Power Administration Tom Mallinger Midwest ISO Darrick Moe Western Area Power Adm Scott Moore American Electric Power Bill Slater Florida Power Corporation Tom Stuchlik Western Resources Joseph Styslinger Southern Company David Thorne D. H. Thorne Consultants, Inc Robert Waldele New York ISO Roman Carter Southern Company John Ahr Alleghany Power Systems	x		

**Draft Comments and Considerations for 2<sup>nd</sup> Posting for Operate Within IROLs Standard Requirement 202 - Monitoring**

Susan Morris SERC Ed Pfeiffer Ameren Ray Palmieri ECAR Tom Vandervort NERC			
<u>Southern Company Generation &amp; Energy Mktg</u> Roman Carter # 5, 6 Joel Dison #5,6 Tony Reed #5,6 Lucius Burris #5,6 David Deerman #5,6 Clifford Shepard #5,6 Michael Smith #5,6 Lloyd Barnes SCGEM 5,6 Gary Miller SCGEM 5,6 Terry Crawley Southern Generation 5 Roger Green Southern Generation 5	x		
<u>Compliance Subcommittee</u>			Change 4.1 to: The responsible entity shall demonstrate compliance to the compliance monitor within the first year that this standard becomes effective or the first year the entity commences operation by information submittal to the compliance monitor, either on or off site at the compliance monitors discretion. Add new 4.2 Subsequent to the initial compliance review, compliance will be re-verified at least every three years using a scheduled on-site review method or un-scheduled (investigation of complaint) method, review of information submitted as requested, or through self-certification, at the discretion of the compliance monitor. Re-number 4.2 and 4.3 to 4.3 and 4.4
<p>The suggested language changes were not adopted for the following reasons:</p> <ul style="list-style-type: none"> <li>- "Information submittal" is an undefined term. Industry commenters have asked that the compliance elements be as specific as possible so that there won't be huge variations from region to region in the application of the compliance monitoring. If an 'information submittal' is the same as a self-certification document, then this is already covered in the original language. Including language that gives each compliance monitor the flexibility to assess this requirement however it chooses, does not conform with the industry's requests for standardization in the compliance monitoring process.</li> </ul> <p>The only significant change between the original language and the proposed new section 4.2 is the addition of the concept that the compliance monitor has the freedom to either conduct an audit per a schedule, or just show up unscheduled. Again, this does not support the industry's request for increased standardization in the compliance monitoring process. The original language included the option of conducting an 'investigation upon compliant' and this seems more appropriate than unscheduled audits.</p>			

**Draft Comments and Considerations for 2<sup>nd</sup> Posting for Operate Within IROLs Standard Requirement 202 - Monitoring**

Stuart Goza TVA #1		x	
Alan Boesch NPPD #1		x	
Dan Boezio & Raj Rana AEP #1, 3, 5, 6		x	
<u>Operating Reliability Working Group SPP</u>		x	
Gerry Burrows KCP&L #1			
Bob Cochran SPS #1			
Peter Kuebeck OG&E #1			
Scott Moore AEP #1			
Tom Stuchlik Westar #1			
Dan Boezio AEP #1			
Matt Bordelon CLECO #1			
Mike Crouch WFEC #1			
Mike Gammon KCP&L #1			
Kevin Goolsby SPP #2			
Bo Jones Westar #1			
Allen Klassen Westar #1			
Thad Ness AEP #1			
Harold Wyble KCP&L #1			
Robert Rhodes SPP #2			
Ed Davis Entergy Services #1		x	
<u>SERC Operations Planning Subcommittee</u>		x	
Carter Edge SEPA #4, 5			
William Gaither So Carolina Pub Serv Auth #1			
Mike Miller Southern Co #1			
Roger Brand Muni Elec Auth GA #1			
Phil Creech Progress Energy – CP&L #1			
Gene Delk So Carolina Elec & Gas #1			
Al McMeekin So Carolina Elec & Gas #1			
Greg Ott Alcoa-Yadkin #1			
Doug Newbaue GA System Operations #1			
Mike Clements TVA #1			
Don Reichenbach Duke Energy #1			
Lynna Estep SERC #2			
Mark Creech TVA #1			



**Draft Comments and Considerations for 2<sup>nd</sup> Posting for Operate Within IROLs Standard Requirement 202 - Monitoring**

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Susan Morris SERC #2 Bill Reinke SERC #2 Sam Stryker Fayettevill PWC #3, 4, 5 Carter Edge SEPA #4, 5 Bill Thompson Dominion Trans #1		x	
Kathleen Goodman ISO-NE #2		x	

**Draft Comments and Considerations for 2<sup>nd</sup> Posting for Operate Within IROLs Standard Requirement 202 - Monitoring**

**Requirement 202 - Monitoring - Do you agree with the levels of non-compliance?**

Commenter	Yes	No	Comments
Kathleen Goodman ISO-NE #2	x		
Terry Bilke Midwest ISO #2	x		
Ken Githens Allegheny Energy Supply #5	x		
William Smith Allegheny Power #1	x		
Stuart Goza TVA #1	x		
<u>NPCC CP9</u> Michael Schiavone National Grid USA #1 Roger Champagne Hydro-Quebec TransEnergie #1 Ralph Rufrano New York Power Authority #1 David Little Nova Scotia Power Inc. #1 David Kiguel Hydro One Networks #1 Michael Potishnak ISO-New England #2 Barry Gee National Grid USA #1 Dan Stosick ISO-New England #2 Fernando Saavedra ISO-New England #2 Greg Campoli New York ISO #2	x		
<u>Southern Co Transmission Planning #1</u> Todd Lucas Southern Co Joe Payne Mississippi Power Company Travis Koval Southern Co Bill Pope Gulf Power Company John Clark Southern Co David Johnson Savannah Electric Mike Miller Southern Co Jim Griffith Southern Co Monroe Landrum Southern Co	x		
Peter Burke ATC #1	x		
Susan Morris SERC #2 Bill Reinke SERC #2 Sam Stryker Fayettevill PWC #3, 4, 5 Carter Edge SEPA #4, 5 Bill Thompson Dominion Trans #1	x		
Gerald Rheault Manitoba Hydro #1, 3, 5, 6	x		

**Draft Comments and Considerations for 2<sup>nd</sup> Posting for Operate Within IROLs Standard Requirement 202 - Monitoring**

Alan Boesch NPPD #1	x		
Dan Boezio & Raj Rana AEP #1, 3, 5, 6	x		
Raymond Mammarella PPL Elec Util #1	x		
Tom Pruitt Duke Power #1	x		
Tony Jankowski We Energies #4	x		
Michael Sidiropoulos Pacificorp	x		
Robert Grover PPL Elec Util #3	x		
<u>Southern Co Transmission Planning</u> Todd Lucas Southern Co #1 Joe Payne Mississippi Pwr Co #3 Travis Koval Southern Co #1 Bill Pope Gulf Pwr Co #3 John Clark Southern Co #1 David Johnson Savannah Electric #3	x		
<u>MAAP Ops Subcommittee #2</u> Llyod Linke MAPP Allan Silk Manitoba Hydro Paul Brune NPPD Tod Gosnell Omaha Public Pwr Dist Paul Koskela Minnesota Pwr Larry Larson Otter Tail Power Derrick Moe WAPA Dick Pursley Great River Energy Martin Trencle Xcel Energy Joseph Knight MAPPCOR	x		
John Horakh MAAC #2	x		
<u>BPA Adm TBL #1</u> James Murphy Mike Viles James Randall Al Johnson Jeff Newby Jim Gronquist Sylvia Wiggerhaus Brian Tuck Dick Spence Tracy Rolstad Steve Hitchens	x		

**Draft Comments and Considerations for 2<sup>nd</sup> Posting for Operate Within IROLs Standard Requirement 202 - Monitoring**

Darrell Richardson Illinois Power #1, 3	x		
David Thorne Pepco #1	x		
Ed Davis Entergy Services #1	x		
<u>SERC Operations Planning Subcommittee</u> Carter Edge SEPA #4, 5 William Gaither So Carolina Pub Serv Auth #1 Mike Miller Southern Co #1 Roger Brand Muni Elec Auth GA #1 Phil Creech Progress Energy – CP&L #1 Gene Delk So Carolina Elec & Gas #1 Al McMeekin So Carolina Elec & Gas #1 Greg Ott Alcoa-Yadkin #1 Doug Newbaue GA System Operations #1 Mike Clements TVA #1 Don Reichenbach Duke Energy #1 Lynna Estep SERC #2 Mark Creech TVA #1	x		
Albert DiCaprio MAAC #2	x		
Mark Heimbach PPL Generation #6	x		
<u>Centerpoint Energy #1</u> Richard Sikes John Jonte Wayne Kemper Glenn Hemperley Brad Calhoun	x		

**Draft Comments and Considerations for 2<sup>nd</sup> Posting for Operate Within IROLs Standard Requirement 202 - Monitoring**

<u>Southern Company Generation &amp; Energy Mktg</u> Roman Carter # 5, 6 Joel Dison #5,6 Tony Reed #5,6 Lucius Burris #5,6 David Deerman #5,6 Clifford Shepard #5,6 Michael Smith #5,6 Lloyd Barnes SCGEM 5,6 Gary Miller SCGEM 5,6 Terry Crawley Southern Generation 5 Roger Green Southern Generation 5	x		
Charles Yeung Reliant #5		x	
<u>FRCC Op, Eng &amp; Mkt Int</u> Linda Campbell FRCC #2 Paul Elwing Lakeland Electric # 3 John Shaffer FPL #1 Bob Remley Clay Elec Coop #4 Patti Metro FRCC #2 Eirc Grant Progress Energy – FL #1 Joe Roos Ocala Electric Utility #3 Joe Krupar FL Muni Pwr Agency #3 Richard Gilbert Lakeland Electric #3 Bill Slater Progress Energy – FL #1 Amy Long Lakeland Electric #1 Roger Westphal Gainesville Regional Util #5 Bob Goss SEPA #5 Steve Wallace Seminore Electric Coop #4 Ted Hobson JEA #1		x	
Alan Johnson Mirant Americas Energy Mktg #6		x	

**Draft Comments and Considerations for 2<sup>nd</sup> Posting for Operate Within IROLs Standard Requirement 202 - Monitoring**

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<u>Operating Reliability Working Group SPP</u> Gerry Burrows KCP&L #1 Bob Cochran SPS #1 Peter Kuebeck OG&E #1 Scott Moore AEP #1 Tom Stuchlik Westar #1 Dan Boezio AEP #1 Matt Bordelon CLECO #1 Mike Crouch WFEC #1 Mike Gammon KCP&L #1 Kevin Goolsby SPP #2 Bo Jones Westar #1 Allen Klassen Westar #1 Thad Ness AEP #1 Harold Wyble KCP&L #1 Robert Rhodes SPP #2		x	
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**Draft Comments and Considerations for 2<sup>nd</sup> Posting for Operate Within IROLs Standard Requirement 202 - Monitoring**

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**Requirement 202 - Monitoring –Other comments**

**Summary Consideration:** While there were many comments recommending specific changes, most commenters indicated support of the requirement, its measures, the compliance monitoring process and the levels of non-compliance. The following changes were made to further improve the level of consensus on this requirement:

- The requirement was re-phrased to clarify that the RA is not operating its reliability area.
- The compliance monitoring process was modified to change the performance reset period to ‘12 months from the last violation’. The compliance monitoring process was also revised to eliminate references to ‘displays’. New language was added to indicate that compliance could be demonstrated by having system operators actively monitoring and comparing real-time system operating parameters associated with interconnection reliability operating limits

The SDT was unable to accommodate the changes recommending that the Transmission Owner and Transmission Operator be added to this requirement. The Functional Model assigns responsibility for establishing reliability limits to the Reliability Authority and these new standards must be written in a manner that supports the delineation of responsibility outlined in the Functional Model. The SDT was also concerned about completely removing the requirements for the TOP, and sent a letter to the Director-Standards recommending that action be taken to review the need for a separate standard that addresses operating within system operating limits. In turn, the Director-Standards informed the NERC Operating Committee (OC) and asked that the OC initiate action to determine if an additional SAR is needed.

Commenter	Comments
Ron Falsetti IMO #2	The term, “real-time” as used in the above {The RA shall monitor real-time system operating parameters to . . . } lacks clarity in defining how well the RA monitors data (ie how often – every 2 sec; 10 seconds, etc). As an example a RA may sample data instantly (real time), but only monitor once every 30 minutes. It is IMO’s view, such sampling frequency satisfies the above measures, however, its adequacy for maintaining reliability must be questioned.
The term, ‘real time monitoring’ was included in the list of defined terms. Several commenters suggested changes to the draft definition, and the revised definition is as follows: “The act of scanning data and drawing conclusions about what the data indicates.” The definition of real time indicates that the associated activity is occurring in the present time period. Specifying a periodicity for monitoring seems to indicate that the monitoring doesn’t need to take place on a continuous basis – and that is not what was intended.	
Stuart Goza TVA #1	It appears from the wording of this draft standard Section 202 Monitoring, 1. Requirements, Item 1.1 that the RA is operating the power system. This requirement must be reworded: <div style="padding-left: 40px;">1.1. The reliability authority shall monitor real-time system operating parameters to determine if the reliability area is operating within its interconnection reliability operating limits.</div> <p>Generally, the Measures should be tied to the Requirements and the Objective Evidence for Compliance (OEC) should be tied to the Measures.</p>

**Draft Comments and Considerations for 2<sup>nd</sup> Posting for Operate Within IROLs Standard Requirement 202 - Monitoring**

	<p>Section 4.3.1 is too specific for the measures it supports. It may be a practical solution that the real-time data and interconnection reliability operating limits be made available to operators in the form of a “display”, however this solution is not prescribed in the measures and should not be listed exclusively.</p> <p>Suggest that section 4.3.1 be rewritten to read:</p> <p style="color: red;">4.3.1. Process used for monitoring and comparing real time data associated with interconnection reliability operating limits in accordance with Measure 2.3 above. This may be accomplished through the use of an operator display and should demonstrate compliance with Measures 2.1 and 2.2.</p>
<p>The requirement was modified to more accurately reflect that the RA is not operating its reliability area.</p> <p>The process used to determine if an IROL is being approached or exceeded should be addressed in the RA Certification standard. This requirement is focused on whether the system operators are actively monitoring, and the ability of the compliance monitor to assess this. If the system operator is actively monitoring, that system operator can tell, in his or her own words, whether any IROLs are being approached or exceeded. If the system operator can't answer this question, then that system operator has not been actively monitoring as required. Section 4.3.1 was modified to read as follows: “System operators actively monitoring and comparing real-time system operating parameters associated with interconnection reliability operating limits.”</p>	
<p><u>Southern Co Transmission Planning #1</u>          Todd Lucas Southern Co          Joe Payne Mississippi Power Company          Travis Koval Southern Co          Bill Pope Gulf Power Company          John Clark Southern Co          David Johnson Savannah Electric          Mike Miller Southern Co          Jim Griffith Southern Co          Monroe Landrum Southern Co</p>	<p>The Transmission Operator should also be included in this requirement for "the areas for which they are responsible".</p>
<p>Under the Functional Model, the TOP does monitor some limits, but not IROLs. While the RA may delegate responsibility for monitoring IROLs to its TOPs, the RA would still be held accountable for compliance with this requirement. Under the Functional Model, only one function is ultimately responsible for each major activity – and the Functional Model assigns the monitoring of system reliability limits to the RA, not the TOP.</p>	
<p>Terry Bilke Midwest ISO #2</p>	<p>TO's should also be monitoring this.          What if other authorities refuse to provide data or provide corrupt data to the RA? It appears the RA is accountable, which doesn't seem appropriate.</p>



**Draft Comments and Considerations for 2<sup>nd</sup> Posting for Operate Within IROLs Standard Requirement 202 - Monitoring**

<p>Under the Functional Model, the TOP does monitor some limits, but not IROLs. While the RA may delegate responsibility for monitoring IROLs to its TOPs, the RA would still be held accountable for compliance with this requirement. Under the Functional Model, only one function is ultimately responsible for each major activity – and the Functional Model assigns the monitoring of system reliability limits to the RA, not the TOP.</p>	
<p>Charles Yeung Reliant #5</p>	<p>Please consider having compliance levels 1 thru 3 for this Requirement. It may be beneficial for reliability to progressively measure adherence to the Requirements for situations where a RA is implementing a phased in start up of operations or transition from existing systems to new systems.</p>
<p>For an entity to obtain RA certification, that entity must have a process in place for monitoring system parameters. These standards are being written for entities that are RAs, and there should not be a phase-in. If an entity wants to operate as an RA, then that entity must be prepared to monitor and assess system conditions. A phase-in will be recommended for the initial implementation of this standard, to give entities time to come into compliance with the new requirements and associated measures.</p>	
<p>Susan Morris SERC #2          Bill Reinke SERC #2          Sam Stryker Fayettevill PWC #3, 4, 5          Carter Edge SEPA #4, 5          Bill Thompson Dominion Trans #1</p>	<p>Please see the comment to question (2), above, concerning the TOs responsibility and role with respect to this standard. If the developers of the standard insist on only one functional entity being responsible for this activity, then that functional entity should be the Transmission Owner. However, we view this activity as a shared activity between the TO(s) and RA. Therefore, we suggest that every occurrence of the term “reliability authority” in all of this section 202 be replaced with “reliability authority and transmission owner(s)”.</p> <p>It should also be acknowledged that entities such as the RA and the TO(s) may delegate their respective monitoring responsibilities to the TOP(s).</p> <p>In addition, it appears from the wording of this draft standard Section 202 Monitoring, 1. Requirements, Item 1.1 that the RA is operating the power system. This requirement must be reworded:          The reliability authority shall monitor real-time system operating parameters to determine if the reliability area is operating within its interconnection reliability operating limits.</p> <p>Generally, the Measures should be tied to the Requirements and the Objective Evidence for Compliance (OEC) should be tied to the Measures.</p> <p>Section 4.3.1 is too specific for the measures it supports. It may be a practical solution that the real-time data and interconnection reliability operating limits be made available to operators in the form of a “display”, however this solution is not prescribed in the measures and should not be listed exclusively.</p>

**Draft Comments and Considerations for 2<sup>nd</sup> Posting for Operate Within IROLs Standard Requirement 202 - Monitoring**

	<p>We suggest that section 4.3.1 be rewritten to read:</p> <p>Process used for monitoring and comparing real time data associated with interconnection reliability operating limits in accordance with Measure 2.3 above. This may be accomplished through the use of an operator display and should demonstrate compliance with Measures 2.1 and 2.2.</p>
<p>Under the Functional Model, the TOP does monitor some limits, but not IROLs. While the RA may delegate responsibility for monitoring IROLs to its TOPs, the RA would still be held accountable for compliance with this requirement. Under the Functional Model, only one function is ultimately responsible for each major activity – and the Functional Model assigns the monitoring of system reliability limits to the RA, not the TOP.</p> <p>The wording of the requirement was modified as suggested to clarify that the RA is not operating its reliability area.</p> <p>The suggested format change was not adopted. The standards have been drafted to be as succinct as possible – and the additional words do not add anything to the standard. In addition, when the standards are completed, they will be available to the industry in a relational database with search capabilities. If the suggested cross-referencing were adopted, and someone downloaded a report that listed just the compliance elements for this standard, the cross references would lead the reader to believe that additional information could be found in the measures – and in many cases this is not true.</p>	
<p>Gerald Rheault Manitoba Hydro #1, 3, 5, 6</p>	<p>In 202.4.3.1, what is meant by a display ? How does one make a display available.</p>
<p>The reference to a display was dropped from the revised standard.</p>	
<p>FRCC Op, Eng &amp; Mkt Int  Linda Campbell FRCC #2  Paul Elwing Lakeland Electric #3  John Shaffer FPL #1  Bob Remley Clay Elec Coop #4  Patti Metro FRCC #2  Eirc Grant Progress Energy – FL #1  Joe Roos Ocala Electric Utility #3  Joe Krupar FL Muni Pwr Agency #3  Richard Gilbert Lakeland Electric #3  Bill Slater Progress Energy – FL #1  Amy Long Lakeland Electric #1  Roger Westphal Gainesville Regional Util #5  Bob Goss SEPA #5  Steve Wallace Seminore Electric Coop #4</p>	<p>Measure 2.3 needs to be clarified to state "The RA shall monitor real-time system operating parameters.." rather than just system operating parameters.</p> <p>We have the same concern that we identified in the comments to Requirement 201 regarding 5.4, the level of non-compliance. <i>(We do agree with the intent of the non-compliance level listed in 5.4; however do have a concern that it presumes that all transmission systems will have an IROL. This may not be true for radial systems. Perhaps 5.4 could be reworded as follows, "No documented analysis of possible IROLs or list of facilities subject to IROLs for the RA's reliability area was provided.)</i></p> <p>Section 6, Sanctions should be removed completely. The compliance monitoring process and non-compliance levels are appropriate parts of the reliability standard. However, the sanctions and penalties are part of the compliance program and are separate. The enforcement matrix should not be attached to this document, even for information only, as that gives the appearance of being part of the standard. The sanctions and penalties, along with the enforcement matrix are the responsibility of the new Compliance and Certification Committee (CCC). If the matrix is attached to the standard, every time the CCC changes it, the standard will need to be revised which is not something we should set ourselves up to do.</p>

**Draft Comments and Considerations for 2<sup>nd</sup> Posting for Operate Within IROLs Standard Requirement 202 - Monitoring**

Ted Hobson JEA #1	
<p>The term, 'real time' was added to measure 2.3 as suggested.          If an entity has no IROLs, then the list will be empty.          The enforcement matrix was attached at the recommendation of NERC's Vice President and Legal Counsel to ensure that reviewers understood the penalty structure.</p>	
Alan Boesch NPPD #1	<p>Step 4.3.1 appears to assume that the RA will use computer displays for real time data. What if some other method that works equally as well is used. As written this is a "how" statement. I would suggest that the statement be "Provide evidence of tools used to monitor real time data".</p>
<p>The reference to a display was dropped from the revised standard.</p>	
Dan Boezio & Raj Rana AEP #1, 3, 5, 6	<p>For clarity consider rewording 202.1.1 as "The Reliability Authority shall perform Real-time Monitoring of applicable operating parameters to determine if....."          Defined terms should be capitalized, such as "Reliability Authority", "Interconnected Reliability Operating Limits", etc.          202.4.2: The performance reset period should be 12 months from the time of the infraction not one calendar year.          Suggest combining 202.4.3 and 202.4.3.1 and rewording as: "The Reliability Authority shall have display(s) with real time data associated with interconnection reliability operating limits.</p>
<p>The requirement was modified to read, "The RA shall perform real-time monitoring of system operating parameters . . ." Adding the adjective, "applicable" would not add any clarity to the standard and was not adopted.          The suggested forat change of capitalizing defined terms has been adopted and is reflected in the revised standard.          There were several commenters who suggested changes to the reset period, and the standard was revised so that all requirements in this standard have the following language: "12 months from the last violation" This change supports your recommendation.          References to displays were dropped from this standard since, under some conditions, the RA may not have displays available. The intent is for the RA to demonstrate that it is performing monitoring; therefore the revised wording for 4.3 meets this requirement. In addition, the RA must demonstrate that it has tools needed for monitoring as part of the RA Certification.</p>	
<p><u>Operating Reliability Working Group SPP</u>          Gerry Burrows KCP&amp;L #1          Bob Cochran SPS #1          Peter Kuebeck OG&amp;E #1          Scott Moore AEP #1          Tom Stuchlik Westar #1          Dan Boezio AEP #1</p>	<p>Combine 4.3 and 4.3.1 into a revised 4.3 as follows:          "The reliability authority shall have displays with real-time data associated with interconnection reliability operating limits."          The performance reset period should be changed to 12 months rather than one calendar year.          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</p>

**Draft Comments and Considerations for 2<sup>nd</sup> Posting for Operate Within IROLs Standard Requirement 202 - Monitoring**

<p>Matt Bordelon CLECO #1  Mike Crouch WFEC #1  Mike Gammon KCP&amp;L #1  Kevin Goolsby SPP #2  Bo Jones Westar #1  Allen Klassen Westar #1  Thad Ness AEP #1  Harold Wyble KCP&amp;L #1  Robert Rhodes SPP #2</p>	<p>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.</p>
<p>There were several commenters who suggested changes to the reset period, and the standard was revised so that all requirements in this standard have the following language: "12 months from the last violation" This change supports your recommendation.</p> <p>References to displays were dropped from this standard since, under some conditions, the RA may not have displays available. The intent is for the RA to demonstrate that it is performing monitoring; therefore the revised wording for 4.3 meets this requirement. In addition, the RA must demonstrate that it has tools needed for monitoring as part of the RA Certification.</p> <p>100 of the 132 commenters were in favor of the proposed levels of non-compliance.</p>	
<p><u>Southern Co Transmission Planning</u>  Todd Lucas Southern Co #1  Joe Payne Mississippi Pwr Co #3  Travis Koval Southern Co #1  Bill Pope Gulf Pwr Co #3  John Clark Southern Co #1  David Johnson Savannah Electric #3</p>	<p>The Transmission Operator should also be included in this requirement for "the areas for which they are responsible".</p>
<p>Under the Functional Model, the TOP does monitor some limits, but not IROLs. While the RA may delegate responsibility for monitoring IROLs to its TOPs, the RA would still be held accountable for compliance with this requirement. Under the Functional Model, only one function is ultimately responsible for each major activity – and the Functional Model assigns the monitoring of system reliability limits to the RA, not the TOP.</p>	
<p>Ed Davis Entergy Services #1</p>	<p>Please see the comment to question (2), above, concerning the TOs responsibility and role with respect to this standard. If the developers of the standard insist on only one functional entity being responsible for this activity, then that functional entity should be the Transmission Owner. However, we view this activity as a shared activity between the TO and RA. Therefore, we suggest that every occurrence of the term "reliability authority" in all of this section 202 be replaced with "reliability authority and transmission owner".</p> <p>In addition, it appears from the wording of this draft standard Section 202 Monitoring, 1.</p>

**Draft Comments and Considerations for 2<sup>nd</sup> Posting for Operate Within IROLs Standard Requirement 202 - Monitoring**

	<p>Requirements, Item 1.1 that the RA is operating the power system. This requirement must be reworded: The reliability authority shall monitor real-time system operating parameters to determine if the reliability area is operating within its interconnection reliability operating limits.</p>
<p>Under the Functional Model, the TOW does not monitor limits. While the RA may delegate responsibility for monitoring IROLs to other functions, the RA would still be held accountable for compliance with this requirement. Under the Functional Model, only one function is ultimately responsible for each major activity – and the Functional Model assigns the monitoring of system reliability limits to the RA, not the TOW.</p> <p>The wording of the requirement was modified as suggested to clarify that the RA is not operating its reliability area.</p>	
<p><u>SERC Operations Planning Subcommittee</u> Carter Edge SEPA #4, 5 William Gaither So Carolina Pub Serv Auth #1 Mike Miller Southern Co #1 Roger Brand Muni Elec Auth GA #1 Phil Creech Progress Energy – CP&amp;L #1 Gene Delk So Carolina Elec &amp; Gas #1 Al McMeekin So Carolina Elec &amp; Gas #1 Greg Ott Alcoa-Yadkin #1 Doug Newbaue GA System Operations #1 Mike Clements TVA #1 Don Reichenbach Duke Energy #1 Lynna Estep SERC #2 Mark Creech TVA #1</p>	<p>Generally, the Measures should be tied to the Requirements and the Objective Evidence for Compliance (OEC) should be tied to the Measures. Section 4.3.1 is too specific for the measures it supports. It may be a practical solution that the real-time data and interconnection reliability operating limits be made available to operators in the form of a “display”, however this solution is not prescribed in the measures and should not be listed exclusively. We suggest that section 4.3.1 be rewritten to read: Process used for monitoring and comparing real time data associated with interconnection reliability operating limits in accordance with Measure 2.3 above. <b>This may be accomplished through the use of an operator display and should demonstrate compliance with Measures 2.1 and 2.2.</b></p>
<p>The suggested format change was not adopted. The standards have been drafted to be as succinct as possible – and the additional words do not add anything to the standard. In addition, when the standards are completed, they will be available to the industry in a relational database with search capabilities. If the suggested cross-referencing were adopted, and someone downloaded a report that listed just the compliance elements for this standard, the cross references would lead the reader to believe that additional information could be found in the measures – and in many cases this is not true.</p> <p>The proposed change was not accepted. References to displays were dropped from this standard since, under some conditions, the RA may not have displays available. The intent is for the RA to demonstrate that it is performing monitoring; therefore the revised wording for 4.3 meets this requirement. In addition, the RA must demonstrate that it has tools needed for monitoring as part of the RA Certification.</p>	
<p>Alan Johnson Mirant Americas Energy Mktg #6</p>	<p>Regarding compliance monitoring, suggest that section 4.3.2 be added to allow compliance monitor inspection of RA audited limit data. With respect to levels of non-compliance, seems that items 5.4.2 and 5.4.3 should have some sort of time boundaries</p>

**Draft Comments and Considerations for 2<sup>nd</sup> Posting for Operate Within IROLs Standard Requirement 202 - Monitoring**

	associated with them before sanctions can be assessed. For example, is the sanction the same regardless of whether real-time data is unavailable for 5 minutes or 5 days?
<p>The compliance monitor assembles the audit data and therefore has unlimited access to the data.</p> <p>The standard was revised to clarify that real time data may be obtained from manual collection as well as from automated sources. This change was made to prevent automatic penalties for telemetry failures. Under the revised standard, the RA's data specification must address how data will be provided when there is loss of automated systems.</p>	
<p><u>Southern Company Generation &amp; Energy Mktg</u>          Roman Carter # 5, 6          Joel Dison #5,6          Tony Reed #5,6          Lucius Burris #5,6          David Deerman #5,6          Clifford Shepard #5,6          Michael Smith #5,6          Lloyd Barnes SCGEM 5,6          Gary Miller SCGEM 5,6          Terry Crawley Southern Generation 5          Roger Green Southern Generation 5</p>	Transmission Operator should be added to 202 1.1.1
<p>Under the Functional Model, the TOP does monitor some limits, but not IROLs. While the RA may delegate responsibility for monitoring IROLs to its TOPs, the RA would still be held accountable for compliance with this requirement. Under the Functional Model, only one function is ultimately responsible for each major activity – and the Functional Model assigns the monitoring of system reliability limits to the RA, not the TOP.</p>	
<p><u>Kathleen Goodman ISO-NE #2</u></p>	<p>ISO-NE believes that, as stated above, data should not be archived unless the limit is not cleared within 30 minutes. Additionally, we suggest the data retention requirement of three years be modified to a 12-month rolling retention.</p>
<p>When an IROL is exceeded, the documentation required is that which is typically found on the system operations log, and shouldn't require any additional effort to develop. Many entities keep operations logs for an indefinite period of time – and this standard requires keeping the data for just 3 years to ensure that there is some data on site when the Compliance Monitor conducts a scheduled audit once every 3 years.</p>	

**Draft Comments and Considerations for 2<sup>nd</sup> Posting for Operate Within IROLs Standard Requirement 203 - Analyses**

**Requirement 203 - Analyses and Assessments Do you agree with the requirement?**

Commenter	Yes	No	Comments
Kathleen Goodman ISO-NE #2	x		
Terry Bilke Midwest ISO #2	x		
Ken Githens Allegheny Energy Supply #5	x		
William Smith Allegheny Power #1	x		
<u>NPCC CP9</u> Michael Schiavone National Grid USA #1 Roger Champagne Hydro-Quebec TransEnergie #1 Ralph Rufrano New York Power Authority #1 David Little Nova Scotia Power Inc. #1 David Kiguel Hydro One Networks #1 Michael Potishnak ISO-New England #2 Barry Gee National Grid USA #1 Dan Stosick ISO-New England #2 Fernando Saavedra ISO-New England #2 Greg Campoli New York ISO #2	x		
Peter Burke ATC #1	x		
Charles Yeung Reliant #5	x		
Gerald Rheault Manitoba Hydro #1, 3, 5, 6	x		
Alan Boesch NPPD #1	x		
Raymond Mammarella PPL Elec Util #1	x		
Michael Sidiropoulos Pacificorp	x		
<u>Operating Reliability Working Group SPP</u> Gerry Burrows KCP&L #1 Bob Cochran SPS #1 Peter Kuebeck OG&E #1 Scott Moore AEP #1 Tom Stuchlik Westar #1 Dan Boezio AEP #1 Matt Bordelon CLECO #1 Mike Crouch WFEC #1 Mike Gammon KCP&L #1 Kevin Goolsby SPP #2	x		

**Draft Comments and Considerations for 2<sup>nd</sup> Posting for Operate Within IROLs Standard Requirement 203 - Analyses**

Bo Jones Westar #1 Allen Klassen Westar #1 Thad Ness AEP #1 Harold Wyble KCP&L #1 Robert Rhodes SPP #2			
Robert Grover PPL Elec Util #3	x		
MAAP Ops Subcommittee #2 Llyod Linke MAPP Allan Silk Manitoba Hydro Paul Brune NPPD Tod Gosnell Omaha Public Pwr Dist Paul Koskela Minnesota Pwr Larry Larson Otter Tail Power Derrick Moe WAPA Dick Pursley Great River Energy Martin Trence Xcel Energy Joseph Knight MAPPCOR	x		
John Horakh MAAC #2	x		
BPA Adm TBL #1 James Murphy Mike Viles James Randall Al Johnson Jeff Newby Jim Gronquist Sylvia Wiggerhaus Brian Tuck Dick Spence Tracy Rolstad Steve Hitchens	x		
Darrell Richardson Illinois Power #1, 3	x		
David Thorne Pepco #1	x		
<u>SERC Operations Planning Subcommittee</u> Carter Edge SEPA #4, 5 William Gaither So Carolina Pub Serv Auth #1 Mike Miller Southern Co #1 Roger Brand Muni Elec Auth GA #1 Phil Creech Progress Energy – CP&L #1 Gene Delk So Carolina Elec & Gas #1	x		



**Draft Comments and Considerations for 2<sup>nd</sup> Posting for Operate Within IROLs Standard Requirement 203 - Analyses**

Al McMeekin So Carolina Elec & Gas #1 Greg Ott Alcoa-Yadkin #1 Doug Newbaue GA System Operations #1 Mike Clements TVA #1 Don Reichenbach Duke Energy #1 Lynna Estep SERC #2 Mark Creech TVA #1			
Albert DiCaprio MAAC #2	x		
Alan Johnson Mirant Americas Energy Mktg #6	x		
Mark Heimbach PPL Generation #6	x		
<u>Centerpoint Energy #1</u> Richard Sikes John Jonte Wayne Kemper Glenn Hemperley Brad Calhoun	x		
<u>Trans Subcommittee</u> Robert E. Reed PJM Daniel Cooper Michigan Public Power Agency Ken Donohoo ERCOT Michael Gildea Duke-Energy, North America Francis Halpin Bonneville Power Administration Tom Mallinger Midwest ISO Darrick Moe Western Area Power Adm Scott Moore American Electric Power Bill Slater Florida Power Corporation Tom Stuchlik Western Resources Joseph Styslinger Southern Company David Thorne D. H. Thorne Consultants, Inc Robert Waldele New York ISO Roman Carter Southern Company John Ahr Alleghany Power Systems Susan Morris SERC Ed Pfeiffer Ameren	x		

**Draft Comments and Considerations for 2<sup>nd</sup> Posting for Operate Within IROLs Standard Requirement 203 - Analyses**

Ray Palmieri ECAR Tom Vandervort NERC			
Tony Jankowski We Energies #4		x	1.2 Only for identified IROL applicable to the RA or could this assessment create a new one?
While this assessment may identify a new IROL, that is not the specific intent of this requirement. This requirement is for measuring real time data against known IROLs.			
<u>Southern Company Generation &amp; Energy Mktg</u> Roman Carter # 5, 6 Joel Dison #5,6 Tony Reed #5,6 Lucius Burris #5,6 David Deerman #5,6 Clifford Shepard #5,6 Michael Smith #5,6 Lloyd Barnes SCGEM 5,6 Gary Miller SCGEM 5,6 Terry Crawley Southern Generation 5 Roger Green Southern Generation 5		x	
Dan Boezio & Raj Rana AEP #1, 3, 5, 6		x	
Tom Pruitt Duke Power #1		x	
Ed Davis Entergy Services #1		x	
Stuart Goza TVA #1		x	
<u>Southern Co Transmission Planning #1</u> Todd Lucas Southern Co Joe Payne Mississippi Power Company Travis Koval Southern Co Bill Pope Gulf Power Company John Clark Southern Co David Johnson Savannah Electric Mike Miller Southern Co Jim Griffith Southern Co Monroe Landrum Southern Co		x	
Susan Morris SERC #2 Bill Reinke SERC #2 Sam Stryker Fayettevill PWC #3, 4, 5		x	

**Draft Comments and Considerations for 2<sup>nd</sup> Posting for Operate Within IROLs Standard Requirement 203 - Analyses**

Carter Edge SEPA #4, 5 Bill Thompson Dominion Trans #1			
<u>FRCC Op, Eng &amp; Mkt Int</u> Linda Campbell FRCC #2 Paul Elwing Lakeland Electric # 3 John Shaffer FPL #1 Bob Remley Clay Elec Coop #4 Patti Metro FRCC #2 Eirc Grant Progress Energy – FL #1 Joe Roos Ocala Electric Utility #3 Joe Krupar FL Muni Pwr Agency #3 Richard Gilbert Lakeland Electric #3 Bill Slater Progress Energy – FL #1 Amy Long Lakeland Electric #1 Roger Westphal Gainesville Regional Util #5 Bob Goss SEPA #5 Steve Wallace Seminore Electric Coop #4 Ted Hobson JEA #1		x	

**Draft Comments and Considerations for 2<sup>nd</sup> Posting for Operate Within IROLs Standard Requirement 203 - Analyses**

**Requirement 203 - Analyses and Assessments - Do you agree with the measures?**

Commenter	Yes	No	Comments
Kathleen Goodman ISO-NE #2	x		
Terry Bilke Midwest ISO #2	x		
Ken Githens Allegheny Energy Supply #5	x		
William Smith Allegheny Power #1	x		
Stuart Goza TVA #1	x		
<u>NPCC CP9</u> Michael Schiavone National Grid USA #1 Roger Champagne Hydro-Quebec TransEnergie #1 Ralph Rufrano New York Power Authority #1 David Little Nova Scotia Power Inc. #1 David Kiguel Hydro One Networks #1 Michael Potishnak ISO-New England #2 Barry Gee National Grid USA #1 Dan Stosick ISO-New England #2 Fernando Saavedra ISO-New England #2 Greg Campoli New York ISO #2	x		
<u>Southern Co Transmission Planning #1</u> Todd Lucas Southern Co Joe Payne Mississippi Power Company Travis Koval Southern Co Bill Pope Gulf Power Company John Clark Southern Co David Johnson Savannah Electric Mike Miller Southern Co Jim Griffith Southern Co Monroe Landrum Southern Co	x		
Peter Burke ATC #1	x		
Charles Yeung Reliant #5	x		
Gerald Rheault Manitoba Hydro #1, 3, 5, 6	x		
<u>FRCC Op, Eng &amp; Mkt Int</u> Linda Campbell FRCC #2 Paul Elwing Lakeland Electric # 3 John Shaffer FPL #1	x		

**Draft Comments and Considerations for 2<sup>nd</sup> Posting for Operate Within IROLs Standard Requirement 203 - Analyses**

Bob Remley Clay Elec Coop #4 Patti Metro FRCC #2 15. Eirc Grant Progress Energy – FL #1 Joe Roos Ocala Electric Utility #3 Joe Krupar FL Muni Pwr Agency #3 Richard Gilbert Lakeland Electric #3 Bill Slater Progress Energy – FL #1 Amy Long Lakeland Electric #1 Roger Westphal Gainesville Regional Util #5 Bob Goss SEPA #5 Steve Wallace Seminore Electric Coop #4 Ted Hobson JEA #1			
Raymond Mammarella PPL Elec Util #1	x		
Tom Pruitt Duke Power #1	x		
Tony Jankowski We Energies #4	x		
Michael Sidiropoulos Pacificorp	x		
Robert Grover PPL Elec Util #3	x		
Southern Co Transmission Planning Todd Lucas Southern Co #1 Joe Payne Mississippi Pwr Co #3 Travis Koval Southern Co #1 Bill Pope Gulf Pwr Co #3 John Clark Southern Co #1 David Johnson Savannah Electric #3	x		
MAAP Ops Subcommittee #2 Llyod Linke MAPP Allan Silk Manitoba Hydro Paul Brune NPPD Tod Gosnell Omaha Public Pwr Dist Paul Koskela Minnesota Pwr Larry Larson Otter Tail Power Derrick Moe WAPA Dick Pursley Great River Energy Martin Trencce Xcel Energy	x		

**Draft Comments and Considerations for 2<sup>nd</sup> Posting for Operate Within IROLs Standard Requirement 203 - Analyses**

Joseph Knight MAPP COR			
John Horakh MAAC #2	x		
Darrell Richardson Illinois Power #1, 3	x		
David Thorne Pepco #1	x		
Albert DiCaprio MAAC #2	x		
Alan Johnson Mirant Americas Energy Mktg #6	x		
Mark Heimbach PPL Generation #6	x		
<u>Centerpoint Energy #1</u> Richard Sikes John Jonte Wayne Kemper Glenn Hemperley Brad Calhoun	x		
<u>Trans Subcommittee</u> Robert E. Reed PJM Daniel Cooper Michigan Public Power Agency Ken Donohoo ERCOT Michael Gildea Duke-Energy, North America Francis Halpin Bonneville Power Administration Tom Mallinger Midwest ISO Darrick Moe Western Area Power Adm Scott Moore American Electric Power Bill Slater Florida Power Corporation Tom Stuchlik Western Resources Joseph Styslinger Southern Company David Thorne D. H. Thorne Consultants, Inc Robert Waldele New York ISO Roman Carter Southern Company John Ahr Alleghany Power Systems Susan Morris SERC Ed Pfeiffer Ameren Ray Palmieri ECAR Tom Vandervort NERC	x		

**Draft Comments and Considerations for 2<sup>nd</sup> Posting for Operate Within IROLs Standard Requirement 203 - Analyses**

<u>Southern Company Generation &amp; Energy Mktg</u> Roman Carter # 5, 6 Joel Dison #5,6 Tony Reed #5,6 Lucius Burris #5,6 David Deerman #5,6 Clifford Shepard #5,6 Michael Smith #5,6 Lloyd Barnes SCGEM 5,6 Gary Miller SCGEM 5,6 Terry Crawley Southern Generation 5 Roger Green Southern Generation 5	x		
Alan Boesch NPPD #1		x	
Dan Boezio & Raj Rana AEP #1, 3, 5, 6		x	
Susan Morris SERC #2 Bill Reinke SERC #2 Sam Stryker Fayettevill PWC #3, 4, 5 Carter Edge SEPA #4, 5 Bill Thompson Dominion Trans #1		x	
<u>Operating Reliability Working Group SPP</u> Gerry Burrows KCP&L #1 Bob Cochran SPS #1 Peter Kuebeck OG&E #1 Scott Moore AEP #1 Tom Stuchlik Westar #1 Dan Boezio AEP #1 Matt Bordelon CLECO #1 Mike Crouch WFEC #1 Mike Gammon KCP&L #1 Kevin Goolsby SPP #2 Bo Jones Westar #1 Allen Klassen Westar #1 Thad Ness AEP #1 Harold Wyble KCP&L #1		x	

**Draft Comments and Considerations for 2<sup>nd</sup> Posting for Operate Within IROLs Standard Requirement 203 - Analyses**

Robert Rhodes SPP #2			
Ed Davis Entergy Services #1		x	
<u>SERC Operations Planning Subcommittee</u> Carter Edge SEPA #4, 5 William Gaither So Carolina Pub Serv Auth #1 Mike Miller Southern Co #1 Roger Brand Muni Elec Auth GA #1 Phil Creech Progress Energy – CP&L #1 Gene Delk So Carolina Elec & Gas #1 Al McMeekin So Carolina Elec & Gas #1 Greg Ott Alcoa-Yadkin #1 Doug Newbaue GA System Operations #1 Mike Clements TVA #1 Don Reichenbach Duke Energy #1 Lynna Estep SERC #2 Mark Creech TVA #1		x	
BPA Adm TBL #1 James Murphy Mike Viles James Randall Al Johnson Jeff Newby Jim Gronquist Sylvia Wiggerhaus Brian Tuck Dick Spence Tracy Rolstad Steve Hitchens		x	



**Draft Comments and Considerations for 2<sup>nd</sup> Posting for Operate Within IROLs Standard Requirement 203 - Analyses**

**Requirement 203 - Analyses and Assessments - Do you agree with the compliance monitoring process?**

Commenter	Yes	No	Comments
Kathleen Goodman ISO-NE #2	x		
Ken Githens Allegheny Energy Supply #5	x		
William Smith Allegheny Power #1	x		
<u>NPCC CP9</u> Michael Schiavone National Grid USA #1 Roger Champagne Hydro-Quebec TransEnergie #1 Ralph Rufrano New York Power Authority #1 David Little Nova Scotia Power Inc. #1 David Kiguel Hydro One Networks #1 Michael Potishnak ISO-New England #2 Barry Gee National Grid USA #1 Dan Stosick ISO-New England #2 Fernando Saavedra ISO-New England #2 Greg Campoli New York ISO #2	x		
<u>Southern Co Transmission Planning #1</u> Todd Lucas Southern Co Joe Payne Mississippi Power Company Travis Koval Southern Co Bill Pope Gulf Power Company John Clark Southern Co David Johnson Savannah Electric Mike Miller Southern Co Jim Griffith Southern Co Monroe Landrum Southern Co	x		
Peter Burke ATC #1	x		
Charles Yeung Reliant #5	x		
Gerald Rheault Manitoba Hydro #1, 3, 5, 6	x		
Alan Boesch NPPD #1	x		
Dan Boezio & Raj Rana AEP #1, 3, 5, 6	x		
Raymond Mammarella PPL Elec Util #1	x		
Michael Sidiropoulos Pacificorp	x		
<u>Operating Reliability Working Group SPP</u> Gerry Burrows KCP&L #1 Bob Cochran SPS #1	x		

**Draft Comments and Considerations for 2<sup>nd</sup> Posting for Operate Within IROLs Standard Requirement 203 - Analyses**

Peter Kuebeck OG&E #1 Scott Moore AEP #1 Tom Stuchlik Westar #1 Dan Boezio AEP #1 Matt Bordelon CLECO #1 Mike Crouch WFEC #1 Mike Gammon KCP&L #1 Kevin Goolsby SPP #2 Bo Jones Westar #1 Allen Klassen Westar #1 Thad Ness AEP #1 Harold Wyble KCP&L #1 Robert Rhodes SPP #2			
<u>Southern Company Generation &amp; Energy Mktg</u> Roman Carter # 5, 6 Joel Dison #5,6 Tony Reed #5,6 Lucius Burris #5,6 David Deerman #5,6 Clifford Shepard #5,6 Michael Smith #5,6 Lloyd Barnes SCGEM 5,6 Gary Miller SCGEM 5,6 Terry Crawley Southern Generation 5 Roger Green Southern Generation 5	x		
Robert Grover PPL Elec Util #3	x		
Albert DiCaprio MAAC #2	x		
Alan Johnson Mirant Americas Energy Mktg #6	x		
Mark Heimbach PPL Generation #6	x		
<u>Centerpoint Energy #1</u> Richard Sikes John Jonte Wayne Kemper Glenn Hemperley Brad Calhoun	x		
<u>Trans Subcommittee</u> Robert E. Reed PJM	x		

**Draft Comments and Considerations for 2<sup>nd</sup> Posting for Operate Within IROLs Standard Requirement 203 - Analyses**

Daniel Cooper Michigan Public Power Agency Ken Donohoo ERCOT Michael Gildea Duke-Energy, North America Francis Halpin Bonneville Power Administration Tom Mallinger Midwest ISO Darrick Moe Western Area Power Adm Scott Moore American Electric Power Bill Slater Florida Power Corporation Tom Stuchlik Western Resources Joseph Styslinger Southern Company David Thorne D. H. Thorne Consultants, Inc Robert Waldele New York ISO Roman Carter Southern Company John Ahr Alleghany Power Systems Susan Morris SERC Ed Pfeiffer Ameren Ray Palmieri ECAR Tom Vandervort NERC			
MAAP Ops Subcommittee #2 Llyod Linke MAPP Allan Silk Manitoba Hydro Paul Brune NPPD Tod Gosnell Omaha Public Pwr Dist Paul Koskela Minnesota Pwr Larry Larson Otter Tail Power Derrick Moe WAPA Dick Pursley Great River Energy Martin Trence Xcel Energy Joseph Knight MAPPCOR	x		
John Horakh MAAC #2	x		
BPA Adm TBL #1 James Murphy Mike Viles James Randall Al Johnson Jeff Newby Jim Gronquist	x		

**Draft Comments and Considerations for 2<sup>nd</sup> Posting for Operate Within IROLs Standard Requirement 203 - Analyses**

Sylvia Wiggerhaus Dick Spence Steve Hitchens	Brian Tuck Tracy Rolstad		
Darrell Richardson	Illinois Power #1, 3	x	
David Thorne	Pepco #1	x	
Tony Jankowski	We Energies #4		x 4.2 Not sure how the matrix resets daily?
<b>The standard was modified so that the reset period is 12 months from the time of violation.</b>			
<u>Compliance Subcommittee</u>			Change 4.1 to: The responsible entity shall demonstrate compliance to the compliance monitor within the first year that this standard becomes effective or the first year the entity commences operation by information submittal to the compliance monitor, either on or off site at the compliance monitors discretion. Add new 4.2 Subsequent to the initial compliance review, compliance will be re-verified at least every three years using a scheduled on-site review method or un-scheduled (investigation of complaint) method, review of information submitted as requested, or through self-certification, at the discretion of the compliance monitor. Re-number 4.2 and 4.3 to 4.3 and 4.4
<b>The suggested language changes were not adopted for the following reasons.</b>			
<ul style="list-style-type: none"> <li>- "Information submittal" is an undefined term. Industry commenters have asked that the compliance elements be as specific as possible so that there won't be huge variations from region to region in the application of the compliance monitoring. If an 'information submittal' is the same as a self-certification document, then this is already covered in the original language. Including language that gives each compliance monitor the flexibility to assess this requirement however it chooses, does not conform with the industry's requests for standardization in the compliance monitoring process.</li> </ul>			
The only significant change between the original language and the proposed new section 4.2 is the addition of the concept that the compliance monitor has the freedom to either conduct an audit per a schedule, or just show up unscheduled. Again, this does not support the industry's request for increased standardization in the compliance monitoring process. The original language included the option of conducting an 'investigation upon compliant' and this seems more appropriate than unscheduled audits.			
Terry Bilke	Midwest ISO #2		x
Stuart Goza	TVA #1		x
Susan Morris Bill Reinke Sam Stryker Carter Edge Bill Thompson	SERC #2 SERC #2 Fayettevill PWC #3, 4, 5 SEPA #4, 5 Dominion Trans #1		x
FRCC Op, Eng & Mkt Int			x

**Draft Comments and Considerations for 2<sup>nd</sup> Posting for Operate Within IROLs Standard Requirement 203 - Analyses**

Linda Campbell FRCC #2 Paul Elwing Lakeland Electric # 3 John Shaffer FPL #1 Bob Remley Clay Elec Coop #4 Patti Metro FRCC #2 Eirc Grant Progress Energy – FL #1 Joe Roos Ocala Electric Utility #3 Joe Krupar FL Muni Pwr Agency #3 Richard Gilbert Lakeland Electric #3 Bill Slater Progress Energy – FL #1 Amy Long Lakeland Electric #1 Roger Westphal Gainesville Regional Util #5 Bob Goss SEPA #5 Steve Wallace Seminore Electric Coop #4 Ted Hobson JEA #1			
Tom Pruitt Duke Power #1		x	
Ed Davis Entergy Services #1		x	
<u>SERC Operations Planning Subcommittee</u> Carter Edge SEPA #4, 5 William Gaither So Carolina Pub Serv Auth #1 Mike Miller Southern Co #1 Roger Brand Muni Elec Auth GA #1 Phil Creech Progress Energy – CP&L #1 Gene Delk So Carolina Elec & Gas #1 Al McMeekin So Carolina Elec & Gas #1 Greg Ott Alcoa-Yadkin #1 Doug Newbaue GA System Operations #1 Mike Clements TVA #1 Don Reichenbach Duke Energy #1 Lynna Estep SERC #2 Mark Creech TVA #1		x	

**Draft Comments and Considerations for 2<sup>nd</sup> Posting for Operate Within IROLs Standard Requirement 203 - Analyses**

**Requirement 203 - Analyses and Assessments - Do you agree with the levels of non-compliance?**

Commenter	Yes	No	Comments
Kathleen Goodman ISO-NE #2	x		
Ken Githens Allegheny Energy Supply #5	x		
William Smith Allegheny Power #1	x		
Stuart Goza TVA #1	x		
<u>NPCC CP9</u> Michael Schiavone National Grid USA #1 Roger Champagne Hydro-Quebec TransEnergie #1 Ralph Rufrano New York Power Authority #1 David Little Nova Scotia Power Inc. #1 David Kiguel Hydro One Networks #1 Michael Potishnak ISO-New England #2 Barry Gee National Grid USA #1 Dan Stosick ISO-New England #2 Fernando Saavedra ISO-New England #2 Greg Campoli New York ISO #2	x		
<u>Southern Co Transmission Planning #1</u> Todd Lucas Southern Co Joe Payne Mississippi Power Company Travis Koval Southern Co Bill Pope Gulf Power Company John Clark Southern Co David Johnson Savannah Electric Mike Miller Southern Co Jim Griffith Southern Co Monroe Landrum Southern Co	x		
Peter Burke ATC #1	x		
Charles Yeung Reliant #5	x		
Gerald Rheault Manitoba Hydro #1, 3, 5, 6	x		
Dan Boezio & Raj Rana AEP #1, 3, 5, 6	x		
Raymond Mammarella PPL Elec Util #1	x		
Tom Pruitt Duke Power #1	x		
Tony Jankowski We Energies #4	x		
Michael Sidiropoulos Pacificorp	x		

**Draft Comments and Considerations for 2<sup>nd</sup> Posting for Operate Within IROLs Standard Requirement 203 - Analyses**

Robert Grover PPL Elec Util #3	x		
MAAP Ops Subcommittee #2 Llyod Linke MAPP Allan Silk Manitoba Hydro Paul Brune NPPD Tod Gosnell Omaha Public Pwr Dist Paul Koskela Minnesota Pwr Larry Larson Otter Tail Power Derrick Moe WAPA Dick Pursley Great River Energy Martin Trence Xcel Energy Joseph Knight MAPPCOR	x		
John Horakh MAAC #2	x		
BPA Adm TBL #1 James Murphy Mike Viles James Randall Al Johnson Jeff Newby Jim Gronquist Sylvia Wiggerhaus Brian Tuck Dick Spence Tracy Rolstad Steve Hitchens	x		
Darrell Richardson Illinois Power #1, 3	x		
David Thorne Pepco #1	x		
Ed Davis Entergy Services #1	x		
Albert DiCaprio MAAC #2	x		
Alan Johnson Mirant Americas Energy Mktg #6	x		
Mark Heimbach PPL Generation #6	x		
Centerpoint Energy #1 Richard Sikes John Jonte Wayne Kemper Glenn Hemperley Brad Calhoun	x		

**Draft Comments and Considerations for 2<sup>nd</sup> Posting for Operate Within IROLs Standard Requirement 203 - Analyses**

<p><u>Southern Company Generation &amp; Energy Mktg</u>          Roman Carter # 5, 6          Joel Dison #5,6          Tony Reed #5,6          Lucius Burris #5,6          David Deerman #5,6          Clifford Shepard #5,6          Michael Smith #5,6          Lloyd Barnes SCGEM 5,6          Gary Miller SCGEM 5,6          Terry Crawley Southern Generation 5          Roger Green Southern Generation 5</p>	<p>x</p>		
<p>Terry Bilke Midwest ISO #2</p>		<p>x</p>	
<p>Susan Morris SERC #2          Bill Reinke SERC #2          Sam Stryker Fayettevill PWC #3, 4, 5          Carter Edge SEPA #4, 5          Bill Thompson Dominion Trans #1</p>		<p>x</p>	
<p><u>FRCC Op, Eng &amp; Mkt Int</u>          Linda Campbell FRCC #2          Paul Elwing Lakeland Electric # 3          John Shaffer FPL #1          Bob Remley Clay Elec Coop #4          Patti Metro FRCC #2          Eirc Grant Progress Energy – FL #1          Joe Roos Ocala Electric Utility #3          Joe Krupar FL Muni Pwr Agency #3          Richard Gilbert Lakeland Electric #3          Bill Slater Progress Energy – FL #1          Amy Long Lakeland Electric #1          Roger Westphal Gainesville Regional Util #5          Bob Goss SEPA #5          Steve Wallace Seminore Electric Coop #4          Ted Hobson JEA #1</p>		<p>x</p>	



**Draft Comments and Considerations for 2<sup>nd</sup> Posting for Operate Within IROLs Standard Requirement 203 - Analyses**

<p><u>SERC Operations Planning Subcommittee</u>                  Carter Edge SEPA #4, 5                  William Gaither So Carolina Pub Serv Auth #1                  Mike Miller Southern Co #1                  Roger Brand Muni Elec Auth GA #1                  Phil Creech Progress Energy – CP&amp;L #1                  Gene Delk So Carolina Elec &amp; Gas #1                  Al McMeekin So Carolina Elec &amp; Gas #1                  Greg Ott Alcoa-Yadkin #1                  Doug Newbaue GA System Operations #1                  Mike Clements TVA #1                  Don Reichenbach Duke Energy #1                  Lynna Estep SERC #2                  Mark Creech TVA #1</p>		x	
<p>Alan Boesch NPPD #1</p>		x	
<p><u>Operating Reliability Working Group SPP</u>                  Gerry Burrows KCP&amp;L #1                  Bob Cochran SPS #1                  Peter Kuebeck OG&amp;E #1                  Scott Moore AEP #1                  Tom Stuchlik Westar #1                  Dan Boezio AEP #1                  Matt Bordelon CLECO #1                  Mike Crouch WFEC #1                  Mike Gammon KCP&amp;L #1                  Kevin Goolsby SPP #2                  Bo Jones Westar #1                  Allen Klassen Westar #1                  Thad Ness AEP #1                  Harold Wyble KCP&amp;L #1                  Robert Rhodes SPP #2</p>		x	

**Draft Comments and Considerations for 2<sup>nd</sup> Posting for Operate Within IROLs Standard Requirement 203 - Analyses**

**Requirement 203 - Analyses and Assessments - Other comments?**

**Summary Consideration:** While there were many comments recommending specific changes, most commenters indicated support of the requirement, and its measures. There were several suggestions for changing the compliance monitoring process and the levels of non-compliance so they better align with the measures and so the levels of non-compliance eliminate sanctions for the temporary loss of telemetry.

The following changes were made to further improve the level of consensus on this requirement:

- The requirement and measures were modified to clarify that the RA is not ‘operating’ its reliability area but instead is monitoring it.
- The compliance monitoring process was modified to change the performance reset period to ‘12 months from the last violation’.
- The compliance monitoring process was also modified to eliminate the need to demonstrate the ability to conduct operational planning analyses and real time assessments – and to add language to indicate that the RA needs to be able to identify that it has conducted an operational planning analysis and real time assessments.
- Levels of non-compliance were adjusted to conform to the new language used to identify how the RA could demonstrate it is in compliance.

The SDT was unable to accommodate the changes recommending that the Transmission Owner and Transmission Operator be added to this requirement. The Functional Model assigns responsibility for monitoring operating reliability limits to the Reliability Authority and these new standards must be written in a manner that supports the delineation of responsibility outlined in the Functional Model.

Commenter	Comments
Terry Bilke Midwest ISO #2	<p>There can be up to 365 of both “real time assessment’ and ‘planning analysis’ violations in a year. Although it’s not likely many will occur, probably every RA will have occurrences of data transmission problems or EMS outages of 30 minutes in a year. Keep in mind the RA relies on data provided by others.</p> <p>Since this is self-reported, its akin to a person sending an annual letter to their state patrol telling them how many times they were speeding during the year so that they can receive back the proper number of tickets in the mail.</p> <p>To accrue a level 4 violation for each data hiccup or EMS outage doesn’t seem appropriate.</p>
	<p>There were several commenters who suggested changes to the performance reset period, and the standard was revised so that all requirements in this standard have the following language: “12 months from the last violation” This change supports your recommendation.</p> <p>Self-certification is just one method used to demonstrate compliance. The compliance monitor is also required to conduct an audit and may use investigations upon complaint to see if this requirement is being met.</p> <p>The language in the standard was revised so that there is not an automatic sanction for the temporary loss of data. Sanctions are tied to the inability to demonstrate that analyses and assessments were conducted.</p>
Ron Falsetti IMO #2	<p>The standard must provide a clear distinction between i) how often IROL’s are assessed, whether in real time or for operational planning analyses and ii) how quickly an IROL violation must be resolved. Requirement 1.2 “ . . . to verify that it is not</p>

**Draft Comments and Considerations for 2<sup>nd</sup> Posting for Operate Within IROLs Standard  
Requirement 203 - Analyses**

	<p>exceeding any interconnection reliability operating limits” can be, in IMO’s opinion, interrupted as to how quickly an IROL violation must be resolved . . . ie: each time it is detected in real-time, which shall be within 30 minutes or less in accordance with measure 2.1.2. This requirement belongs in section 201.</p>
<p>Requirement 202 requires that the RA perform real-time monitoring of system operating parameters to determine if its reliability area is operating within its interconnection reliability operating limits.</p> <p>Requirement 203 (this requirement) addresses the minimum frequency for conducting operational planning analyses and real time assessments to assess whether the planned bulk electric system operations within the reliability authority’s reliability area will exceed any of its interconnection reliability operating limits and to determine if the RA’s reliability area is exceeding any interconnection reliability operating limits or is expected to exceed any interconnection reliability operating limits</p> <p>Each IROL has an associated <math>T_v</math> – <math>T_v</math> represents the maximum time that an IROL can be exceeded without compliance sanctions being applied. This is addressed in Requirement 204 – Actions. The <math>T_v</math> is the element that determines how much time the RA has to resolve an IROL – and it is not necessarily 30 minutes.</p>	
<p>Stuart Goza TVA #1</p>	<p>It appears from the wording of this draft standard Section 203 Analysis and Assessments, 1. Requirements, Item 1.1 that the RA is operating the power system. This requirement must be reworded:</p> <p style="padding-left: 40px;">1.1. The reliability authority shall perform operational planning analyses to verify that the planned bulk electric system operations will not exceed any of its interconnection reliability operating limits.</p> <p>The wording of Item 1.2 should also be revised:</p> <p style="padding-left: 40px;">1.2. The reliability authority shall perform real-time assessments to verify that <b>the power system</b> it is not exceeding any interconnection reliability operating limits.</p> <p>Generally, the Measures should be tied to the Requirements and the Objective Evidence for Compliance (OEC) should be tied to the Measures.</p> <p>Section 4.3 should be rewritten to read:</p> <p style="padding-left: 40px;">4.3. <b>The reliability authority shall demonstrate in accordance with Measure 2.1, the following upon the request of the compliance monitor:</b></p> <p style="padding-left: 80px;">4.3.1. <b>Ability to perform an operational planning analysis</b></p> <p style="padding-left: 80px;">4.3.2. <b>Ability to perform a real time assessment</b></p>

**Draft Comments and Considerations for 2<sup>nd</sup> Posting for Operate Within IROLs Standard Requirement 203 - Analyses**

1.1 was revised as follows: "The Reliability Authority shall assess whether the planned Bulk Electric System operations within the Reliability Authority's Reliability Authority Area will exceed any of its Interconnection Reliability Operating Limits." Although this does not match your suggested change on a word-for-word basis, it supports the intent of your suggestion.

1.2 was revised as follows: "The reliability authority shall perform real-time assessments to verify that it is not determine if its reliability authority area is exceeding any interconnection reliability operating limits or is expected to exceed any interconnection reliability operating limits." Although this does not match your suggested change on a word-for-word basis, it supports the intent of your suggestion.

The suggested format change was not adopted. The standards have been drafted to be as succinct as possible – and the additional words do not add anything to the standard. In addition, when the standards are completed, they will be available to the industry in a relational database with search capabilities. If the suggested cross-referencing were adopted, and someone downloaded a report that listed just the compliance elements for this standard, the cross references would lead the reader to believe that additional information could be found in the measures – and in many cases this is not true.

Kathleen Goodman ISO-NE #2  
NPCC CP9  
 Michael Schiavone National Grid USA #1  
 Roger Champagne Hydro-Quebec TransEnergie #1  
 Ralph Rufrano New York Power Authority #1  
 David Little Nova Scotia Power Inc. #1  
 David Kiguel Hydro One Networks #1  
 Michael Potishnak ISO-New England #2  
 Barry Gee National Grid USA #1  
 Dan Stosick ISO-New England #2  
 Fernando Saavedra ISO-New England #2  
 Greg Campoli New York ISO #2

NPCC (ISO-NE) requests the drafting team to provide their thoughts and incorporate allowances in the compliance area for EMS "down time" for maintenance or to switch over to backup system should problems arise.

Although we agree with the measures stated, we would suggest that more frequent in-day analyses based on changed system conditions to predict system performance in the coming hours be required.

The compliance monitoring process and the levels of non-compliance were adjusted so that there should not be any 'automatic' sanctions for temporary loss of telemetry. The revisions made to the standard improve the links between the compliance monitoring process, the levels of non-compliance and the measures.

The standard does set 'minimum' requirements. An RA observing changing system conditions needs to monitor and assess its system more closely, but this is difficult to convey in a standard that must have objective measures.

Southern Co Transmission Planning #1  
 Todd Lucas Southern Co  
 Joe Payne Mississippi Power Company  
 Travis Koval Southern Co  
 Bill Pope Gulf Power Company  
 John Clark Southern Co  
 David Johnson Savannah Electric  
 Mike Miller Southern Co

The Transmission Operator should also be included in this requirement for "the areas for which they are responsible".

**Draft Comments and Considerations for 2<sup>nd</sup> Posting for Operate Within IROLs Standard Requirement 203 - Analyses**

<p>Jim Griffith Southern Co Monroe Landrum Southern Co</p>	
<p>The Functional Model assigns the RA responsibility for performing reliability analyses and these new standards must be written in a manner that supports the delineation of responsibility outlined in the Functional Model. The Transmission Operator is responsible for local network integrity, not the reliability of the bulk transmission system.</p>	
<p>Susan Morris SERC #2 Bill Reinke SERC #2 Sam Stryker Fayettevill PWC #3, 4, 5 Carter Edge SEPA #4, 5 Bill Thompson Dominion Trans #1</p>	<ol style="list-style-type: none"> <li>1. Please see the comment to question (2), above, concerning the TOs responsibility and role with respect to this standard. If the developers of the standard insist on only one functional entity being responsible for this activity, then that functional entity should be the Transmission Owner. However, we view this activity as a shared activity between the TO(s) and RA. Therefore, we suggest that every occurrence of the term “reliability authority” in all of this section 203 be replaced with “reliability authority and transmission owner(s)”.</li> <li>2. In addition, it appears from the wording of this draft standard Section 203 Analysis and Assessments, 1. Requirements, Item 1.1 that the RA is operating the power system. This requirement must be reworded:  <ul style="list-style-type: none"> <li>The reliability authority shall perform operational planning analyses to verify that the planned bulk electric system operations will not exceed any of its interconnection reliability operating limits.</li> </ul> </li> <li>3. The wording of Item 1.2 should also be revised to make it clear the RA and TO(s) verify the power system operation is not exceeding IROL limits:  <ul style="list-style-type: none"> <li>The reliability authority shall perform real-time assessments to verify that the power system it is not exceeding any interconnection reliability operating limits.</li> <li>The transmission owner(s) shall perform real-time assessments to verify its equipment is not exceeding any interconnection reliability operating limits.</li> </ul> </li> <li>4. Generally, the Measures should be tied to the Requirements and the Objective Evidence for Compliance (OEC) should be tied to the Measures.            Section 4.3 should be rewritten to read:  <ul style="list-style-type: none"> <li>4.3. The reliability authority shall demonstrate in accordance with Measure 2.1, the following upon the request of the compliance monitor:               <ol style="list-style-type: none"> <li>4.3.1. Ability to perform an operational planning analysis</li> <li>4.3.2. Ability to perform a real time assessment</li> </ol> </li> </ul> </li> </ol>

**Draft Comments and Considerations for 2<sup>nd</sup> Posting for Operate Within IROLs Standard Requirement 203 - Analyses**

<ol style="list-style-type: none"> <li>1. The Functional Model assigns the RA responsibility for performing reliability analyses and these new standards must be written in a manner that supports the delineation of responsibility outlined in the Functional Model. The Transmission Owner is responsible for establishing transmission facility ratings, but is not assigned any responsibility for conducting reliability analyses.</li> <li>2. The intent of the suggested revision to requirement 1.1 is reflected in the changes made to the standard. The requirement was revised as follows: The reliability authority shall perform operational planning analyses to <del>verify that its</del> <b>assess whether the</b> planned bulk electric system operations <b>within the reliability authority's reliability authority area</b> will <del>not</del> exceed any of its interconnection reliability operating limits.</li> <li>3. The TOW was not added to the list of functions that must comply with requirement 203.1.2 because under the Functional Model the Transmission Owner is not responsible for conducting reliability assessments.</li> <li>4. The suggested format change was not adopted. The standards have been drafted to be as succinct as possible – and the additional words do not add anything to the standard. In addition, when the standards are completed, they will be available to the industry in a relational database with search capabilities. If the suggested cross-referencing were adopted, and someone downloaded a report that listed just the compliance elements for this standard, the cross references would lead the reader to believe that additional information could be found in the measures –and in many cases this is not true.</li> </ol>	
<p>Gerald Rheault Manitoba Hydro #1, 3, 5, 6</p>	<p>In item 203.1.1 the words “will not exceed” are used. The correct phrase should be “should not exceed” since the ability to predict is only valid for events studied, not for unanticipated system conditions.</p> <p>In item 203.2.1.1, there should be a statement indicating the range of studies required. Should the contingencies applicable to SOL's be used or should the range of studies be broader?</p>
<p>Requirement 203.1.1 was revised as follows: “The reliability authority shall perform operational planning analyses to <del>verify that its</del> <b>assess whether the</b> planned bulk electric system operations <b>within the reliability authority's reliability authority area</b> will <del>not</del> exceed any of its interconnection reliability operating limits.”</p> <p>While the revised wording does not match word-for-word the suggested change, the intent of the recommended change is supported in the revisions that were made.</p> <p>Different RAs use different tools to conduct these analyses, and specifying what tools should be used seems beyond the scope of this standard. Note that the standard does not require any specific ‘study’.</p>	
<p><u>FRCC Op, Eng &amp; Mkt Int</u>          Linda Campbell FRCC #2          Paul Elwing Lakeland Electric # 3          John Shaffer FPL #1          Bob Remley Clay Elec Coop #4          Patti Metro FRCC #2          Eirc Grant Progress Energy – FL #1</p>	<ol style="list-style-type: none"> <li>1. In 1.1 it states that the RA is performing operational planning analyses to "verify that its planned bulk electric system operations will not exceed.." Is that really what they are doing? It would seem to us that this operation planning is being done to determine if there is a potential problem so that actions can be directed to alleviate or mitigate the problem so that IROL violations will not occur. The SDT may want to consider rewording this for clarification.</li> <li>2. Also, 1.2 states that real time assessments are to verify that it is not exceeding IROLs. Again, verify does not seem to be the correct word.</li> </ol>

**Draft Comments and Considerations for 2<sup>nd</sup> Posting for Operate Within IROLs Standard Requirement 203 - Analyses**

<p>Joe Roos Ocala Electric Utility #3          Joe Krupar FL Muni Pwr Agency #3          Richard Gilbert Lakeland Electric #3          Bill Slater Progress Energy – FL #1          Amy Long Lakeland Electric #1          Roger Westphal Gainesville Regional Util #5          Bob Goss SEPA #5          Steve Wallace Seminore Electric Coop #4          Ted Hobson JEA #1</p>	<ol style="list-style-type: none"> <li>3. The reason we have stated that we do not agree with the compliance monitoring process is that the performance reset period of one day seems much too frequent. Even though the measures are to be done daily, the performance monitoring period should not be more often than monthly. If one day is kept, it would be a great burden on both the RA and the compliance monitor and we are not sure that would really improve reliability.</li> <li>4. Since we believe the reset period should be monthly, the non-compliance levels should be adjusted to reflect level one for a small number of days, and level 4 being every day of the month.</li> <li>5. We also have a question about 5.4 level of non-compliance for operational planning. Does the SDT assume these analyses are load flow studies? If so, we agree with the daily measure. However; if the intent was to also include daily stability studies, we do not agree. Stability studies should only be required to be performed annual and prior to scheduled maintenance outages that create potential for IROLs. Please see our earlier comments about section 6 - Sanctions.</li> </ol>
<ol style="list-style-type: none"> <li>1. Requirement 203.1.1 was revised to reflect the suggested change: “The reliability authority shall perform operational planning analyses to <del>verify that its assess whether the</del> planned bulk electric system operations <del>within the reliability authority's reliability authority area will not</del> exceed any of its interconnection reliability operating limits.”</li> <li>2. Requirement 203.1.2 was revised to reflect the suggested change: “The reliability authority shall perform real-time assessments to <del>verify that it is not determine</del> if its reliability authority area is exceeding any interconnection reliability operating limits <del>or is expected to exceed any interconnection reliability operating limits.</del>”</li> <li>3. There were several commenters who suggested changes to the reset period, and the standard was revised so that all requirements in this standard have the following language: “12 months from the last violation” The 12 months was adopted because several entities indicated that shorter periods would be unwieldy for all involved in the process.</li> <li>4. Levels of non-compliance were adjusted to conform to the new language used to identify how the RA could demonstrate it is in compliance.</li> <li>5. The standard does not specify what analyses the RA must use – only that analyses and assessments must be conducted. It would be unrealistic to expect the RA to conduct a stability study each day, and this is not what was intended.</li> </ol>	
<p>Alan Boesch NPPD #1</p>	<p>Why was 30 minutes used for a real time assessment? Is one day a good target to be performing planning Analysis? If a generator or transmission operator is planning an outage will the RA tell the generator or transmission operator the day before the outage that is OK to proceed with the outage? Is that process covered in some other standard?</p>

**Draft Comments and Considerations for 2<sup>nd</sup> Posting for Operate Within IROLs Standard Requirement 203 - Analyses**

The 30 minute timeframe for conducting real-time assessments was suggested to the industry as the minimum timeframe between assessments. Current Operating Policy (Policy 9) requires that an operational planning analysis be conducted at least once each day looking at the day ahead.

The collection of data needed to conduct an operational planning analysis and a real-time assessment is addressed in the data specification requirement of this standard. In that requirement, the RA must document what data it needs, and when it needs that data – and data associated with outages should be included in that data specification

Dan Boezio & Raj Rana AEP #1, 3, 5, 6

1. Wording of 203.1 implies that a specific favorable outcome of Operational Planning Analyses and Real-time Assessments is required. Consider reword as:  
 203.1.1 The Reliability Authority shall perform Operational Planning Analyses to assess if the planned Bulk Electric System operations will result in any of its Interconnection Reliability Operating Limits being exceeded. The Reliability Authority will modify planned operations if analyses indicate such a violation.  
 203.1.2 The Reliability Authority shall perform Real-time assessments to assess if any Interconnection Reliability Operating Limits are being exceeded. Any identified violated will be addressed immediately.
2. Defined terms should be capitalized, such as “Reliability Authority”, “Operational Planning Analyses”, “Interconnected Reliability Operating Limits”, etc
3. 203.4 Compliance Monitoring Process: Today we require the Reliability Coordinators to have available for review and investigation study case results and related documentation for a rolling three month period (refer to compliance template P9 T1). Maintaining this compliance requirement may prove beneficial during investigations due to complaints and would not add any additional reporting burden beyond today’s process.



**Draft Comments and Considerations for 2<sup>nd</sup> Posting for Operate Within IROLs Standard  
Requirement 203 - Analyses**

<p>1. Requirement 203.1.1 was revised to reflect the first part of the suggested change: “The reliability authority shall perform operational planning analyses to <del>verify that its</del> <del>assess whether the</del> planned bulk electric system operations <del>within the reliability authority’s reliability authority area</del> will <del>not</del> exceed any of its interconnection reliability operating limits.”</p> <p>The second part of the suggested change was not made because taking action based on the results of the operational planning analysis or as a result of a real-time assessment is addressed in Requirement 204 – Actions.</p> <p>Requirement 203.1.2 was revised to reflect the first part of the suggested change: “The reliability authority shall perform real-time assessments to <del>verify that it is not determine</del> if its reliability authority area is exceeding any interconnection reliability operating limits or is <del>expected to exceed any interconnection reliability operating limits.</del>”</p> <p>The second part of the suggested change was not made because taking action based on the results of the operational planning analysis or as a result of a real-time assessment is addressed in Requirement 204 – Actions.</p> <p>2. The suggested format change of capitalizing defined words has been adopted and is reflected in the revised standard.</p> <p>3. RA Certification requires that the RA have tools in place to conduct analyses. This requirement is looking at whether or not the RA is using these tools on a regular basis as an aid in protecting reliability. The Compliance Monitoring section of this requirement was revised to focus more on the real-time use of these tools.</p>	
<p>Tom Pruitt Duke Power #1</p>	<p>Modify section 203.1.1 to read "The reliability authority shall perform, or direct performance of, operational planning analyses . . . ". Modify 203.4.2 to read "The performance-reset period shall be one year. The . . ."</p>
<p>For consistency, the phrase, “or direct . . .” is being used where the Functional Model indicates that the RA directs others. For this requirement, the Functional Model assigns sole responsibility for conducting reliability analyses to the RA, so the phrase, “. . .or direct” was not added. The RA may delegate any of its tasks to others, but the standards are not being written to suggest this delegation.</p> <p>There were several commenters who suggested changes to the reset period, and the standard was revised so that all requirements in this standard have the following language: “12 months from the last violation”</p>	

**Draft Comments and Considerations for 2<sup>nd</sup> Posting for Operate Within IROLs Standard Requirement 203 - Analyses**

<p><u>Operating Reliability Working Group SPP</u>                  Gerry Burrows KCP&amp;L #1                  Bob Cochran SPS #1                  Peter Kuebeck OG&amp;E #1                  Scott Moore AEP #1                  Tom Stuchlik Westar #1                  Dan Boezio AEP #1                  Matt Bordelon CLECO #1                  Mike Crouch WFEC #1                  Mike Gammon KCP&amp;L #1                  Kevin Goolsby SPP #2                  Bo Jones Westar #1                  Allen Klassen Westar #1                  Thad Ness AEP #1                  Harold Wyble KCP&amp;L #1                  Robert Rhodes SPP #2</p>	<p>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 2.1.2 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.</p> <p>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? 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?</p>
<p>The term, 'analysis' is not synonymous with 'study.' IROLs may be associated with stability limits, but this does not mean that a stability study needs to be conducted every 30 minutes. The standard does not specify what tools must be used to conduct the analysis or the assessment – this is left up to the RA.</p> <p>The levels of non-compliance were adjusted to reflect changes to the compliance monitoring process. Under the revised standard, a level three non-compliance was added.</p>	
<p>BPA Adm TBL #1                  James Murphy Mike Viles                  James Randall Al Johnson                  Jeff Newby Jim Gronquist                  Sylvia Wiggerhaus Brian Tuck                  Dick Spence Tracy Rolstad                  Steve Hitchens</p>	<p>2.1.1 There should be no time frame, as long as the analysis is done prior to the need it shouldn't matter.</p> <p>5.1 Remove - to indicate actions taken or directives issued to mitigate the instance. This additional verbage is not needed, the discription of the documentation is already covered in the requirements.</p> <p>5.4 Remove at least once each day.</p>

**Draft Comments and Considerations for 2<sup>nd</sup> Posting for Operate Within IROLs Standard Requirement 203 - Analyses**

The timeframe is needed to ensure that all RAs commit to doing these analyses and assessments on a regular basis. The timeframes suggested represent the minimum acceptable timeframes. Note that the operational planning analysis does not need to be a detailed, documented study – it merely needs to “. . . examine the expected system conditions, given the load forecast(s), known system constraints such as facility outages, and generator outages and limitations, etc. “

The comment about 5.1 is addressing Requirement 204. When these new standards are fully developed, they will be available to the industry through a relational database. We are trying to maintain enough clarity in the measures so that if these were downloaded as a result of a query (e.g. – a report of all measures which the RA is responsible for meeting), the measures would contain enough definition to be understandable.

Darrell Richardson Illinois Power #1, 3

We agree with this but think there should possibly be some room for “extenuating circumstances” (i.e., computer problems, in middle of restoration, etc.).

The requirement was revised to shift emphasis from demonstrating that the tools used to conduct analyses and assessments were working to demonstrating that the analyses and assessments were being conducted by humans, using whatever methods available. This shift in emphasis supports your suggestion.

Ed Davis Entergy Services #1

1. Please see the comment to question (2), above, concerning the TOs responsibility and role with respect to this standard. If the developers of the standard insist on only one functional entity being responsible for this activity, then that functional entity should be the Transmission Owner. However, we view this activity as a shared activity between the TO and RA. Therefore, we suggest that every occurrence of the term “reliability authority” in all of this section 203 be replaced with “reliability authority and transmission owner”.
2. In addition, it appears from the wording of this draft standard Section 203 Analysis and Assessments, 1. Requirements, Item 1.1 that the RA is operating the power system. This requirement must be reworded:  
 The reliability authority shall perform operational planning analyses to verify that the planned bulk electric system operations will not exceed any of its interconnection reliability operating limits.
3. The wording of Item 1.2 should also be revised to make it clear the RA and TO verify the power system operation is not exceeding IROL limits:  
  
 1.2. The reliability authority shall perform real-time assessments to verify that the power system is not exceeding any interconnection reliability operating limits. The transmission owner shall perform real-time assessments to verify its equipment is not exceeding any interconnection reliability operating limits.

**Draft Comments and Considerations for 2<sup>nd</sup> Posting for Operate Within IROLs Standard Requirement 203 - Analyses**

The Functional Model assigns the RA responsibility for performing reliability analyses and these new standards must be written in a manner that supports the delineation of responsibility outlined in the Functional Model. The Transmission Owner is responsible for establishing transmission facility ratings, but is not assigned any responsibility for conducting reliability analyses.

The intent of the suggested revision to requirement 1.1 is reflected in the changes made to the standard. The requirement was revised as follows: The reliability authority shall perform operational planning analyses to ~~verify that its~~ assess whether the planned bulk electric system operations within the reliability authority's reliability authority area will ~~not~~ exceed any of its interconnection reliability operating limits.

The TOW was not added to the list of functions that must comply with requirement 203.1.2 because under the Functional Model the Transmission Owner is not responsible for conducting reliability assessments.

SERC Operations Planning Subcommittee

- Carter Edge SEPA #4, 5
- William Gaither So Carolina Pub Serv Auth #1
- Mike Miller Southern Co #1
- Roger Brand Muni Elec Auth GA #1
- Phil Creech Progress Energy – CP&L #1
- Gene Delk So Carolina Elec & Gas #1
- Al McMeekin So Carolina Elec & Gas #1
- Greg Ott Alcoa-Yadkin #1
- Doug Newbaue GA System Operations #1
- Mike Clements TVA #1
- Don Reichenbach Duke Energy #1
- Lynna Estep SERC #2
- Mark Creech TVA #1

Generally, the Measures should be tied to the Requirements and the Objective Evidence for Compliance (OEC) should be tied to the Measures.

Section 4.3 should be rewritten to read:

The reliability authority shall demonstrate in accordance with Measure 2.1, the following upon the request of the compliance monitor:

- 4.3.1. Ability to perform an operational planning analysis
- 4.3.2. Ability to perform a real time assessment

The suggested format change was not adopted. The standards have been drafted to be as succinct as possible – and the additional words do not add anything to the standard. In addition, when the standards are completed, they will be available to the industry in a relational database with search capabilities. If the suggested cross-referencing were adopted, and someone downloaded a report that listed just the compliance elements for this standard, the cross references would lead the reader to believe that additional information could be found in the measures – and in many cases this is not true.

**Draft Comments and Considerations for 2<sup>nd</sup> Posting for Operate Within IROLs Standard Requirement 203 - Analyses**

<p><u>Southern Company Generation &amp; Energy Mktg</u>          Roman Carter # 5, 6          Joel Dison #5,6          Tony Reed #5,6          Lucius Burris #5,6          David Deerman #5,6          Clifford Shepard #5,6          Michael Smith #5,6          Lloyd Barnes SCGEM 5,6          Gary Miller SCGEM 5,6          Terry Crawley Southern Generation 5          Roger Green Southern Generation 5</p>	<p>The Transmission Operator should be added to 203 1.1.1, 203 1.1.2, 203 2.2.1.</p>
<p>The Functional Model assigns the RA responsibility for performing reliability analyses and these new standards must be written in a manner that supports the delineation of responsibility outlined in the Functional Model. The Transmission Operator is responsible for local network integrity, not the reliability of the bulk transmission system.</p>	

**Draft Comments and Considerations for 2<sup>nd</sup> Posting for Operate Within IROLs Standard Requirement 204 - Actions**

**Requirement 204 - Actions - Do you agree with the requirement?**

Commenter	Yes	No	Comments
Terry Bilke Midwest ISO #2	x		
Ken Githens Allegheny Energy Supply #5	x		
William Smith Allegheny Power #1	x		
Stuart Goza TVA #1	x		
<u>NPCC CP9</u> Michael Schiavone National Grid USA #1 Roger Champagne Hydro-Quebec TransEnergie #1 Ralph Rufrano New York Power Authority #1 David Little Nova Scotia Power Inc. #1 David Kiguel Hydro One Networks #1 Michael Potishnak ISO-New England #2 Barry Gee National Grid USA #1 Dan Stosick ISO-New England #2 Fernando Saavedra ISO-New England #2 Greg Campoli New York ISO #2	x		
<u>Southern Co Transmission Planning #1</u> Todd Lucas Southern Co Joe Payne Mississippi Power Company Travis Koval Southern Co Bill Pope Gulf Power Company John Clark Southern Co David Johnson Savannah Electric Mike Miller Southern Co Jim Griffith Southern Co Monroe Landrum Southern Co	x		
Peter Burke ATC #1	x		
Charles Yeung Reliant #5	x		
Susan Morris SERC #2 Bill Reinke SERC #2 Sam Stryker Fayettevill PWC #3, 4, 5 Carter Edge SEPA #4, 5 Bill Thompson Dominion Trans #1	x		
Gerald Rheault Manitoba Hydro #1, 3, 5, 6	x		

**Draft Comments and Considerations for 2<sup>nd</sup> Posting for Operate Within IROLs Standard Requirement 204 - Actions**

Alan Boesch NPPD #1	x		
Dan Boezio & Raj Rana AEP #1, 3, 5, 6	x		
Raymond Mammarella PPL Elec Util #1	x		
Tom Pruitt Duke Power #1	x		
Tony Jankowski We Energies #4	x		
Michael Sidiropoulos Pacificorp	x		
<u>Operating Reliability Working Group SPP</u> Gerry Burrows KCP&L #1 Bob Cochran SPS #1 Peter Kuebeck OG&E #1 Scott Moore AEP #1 Tom Stuchlik Westar #1 Dan Boezio AEP #1 Matt Bordelon CLECO #1 Mike Crouch WFEC #1 Mike Gammon KCP&L #1 Kevin Goolsby SPP #2 Bo Jones Westar #1 Allen Klassen Westar #1 Thad Ness AEP #1 Harold Wyble KCP&L #1 Robert Rhodes SPP #2	x		
Robert Grover PPL Elec Util #3	x		
<u>MAAP Ops Subcommittee #2</u> Llyod Linke MAPP Allan Silk Manitoba Hydro Paul Brune NPPD Tod Gosnell Omaha Public Pwr Dist Paul Koskela Minnesota Pwr Larry Larson Otter Tail Power Derrick Moe WAPA Dick Pursley Great River Energy Martin Trence Xcel Energy Joseph Knight MAPPCOR	x		

**Draft Comments and Considerations for 2<sup>nd</sup> Posting for Operate Within IROLs Standard Requirement 204 - Actions**

John Horakh MAAC #2	x		
<u>BPA Adm TBL #1</u>	x		
James Murphy Mike Viles			
James Randall Al Johnson			
Jeff Newby Jim Gronquist			
Sylvia Wiggerhaus Brian Tuck			
Dick Spence Tracy Rolstad			
Steve Hitchens			
Darrell Richardson Illinois Power #1, 3	x		
David Thorne Pepco #1	x		
Ed Davis Entergy Services #1	x		
SERC Operations Planning Subcommittee	x		
Carter Edge SEPA #4, 5			
William Gaither So Carolina Pub Serv Auth #1			
Mike Miller Southern Co #1			
Roger Brand Muni Elec Auth GA #1			
Phil Creech Progress Energy – CP&L #1			
Gene Delk So Carolina Elec & Gas #1			
Al McMeekin So Carolina Elec & Gas #1			
Greg Ott Alcoa-Yadkin #1			
Doug Newbaue GA System Operations #1			
Mike Clements TVA #1			
Don Reichenbach Duke Energy #1			
Lynna Estep SERC #2			
Mark Creech TVA #1			
Albert DiCaprio MAAC #2	x		
Alan Johnson Mirant Americas Energy Mktg #6	x		
Mark Heimbach PPL Generation #6	x		
<u>Centerpoint Energy #1</u>	x		
Richard Sikes			
John Jonte			
Wayne Kemper			
Glenn Hemperley			
Brad Calhoun			



**Draft Comments and Considerations for 2<sup>nd</sup> Posting for Operate Within IROLs Standard Requirement 204 - Actions**

<u>Trans Subcommittee</u> Robert E. Reed PJM Daniel Cooper Michigan Public Power Agency Ken Donohoo ERCOT Michael Gildea Duke-Energy, North America Francis Halpin Bonneville Power Administration Tom Mallinger Midwest ISO Darrick Moe Western Area Power Adm Scott Moore American Electric Power Bill Slater Florida Power Corporation Tom Stuchlik Western Resources Joseph Styslinger Southern Company David Thorne D. H. Thorne Consultants, Inc Robert Waldele New York ISO Roman Carter Southern Company John Ahr Alleghany Power Systems Susan Morris SERC Ed Pfeiffer Ameren Ray Palmieri ECAR Tom Vandervort NERC	x		
<u>Southern Company Generation &amp; Energy Mktg</u> Roman Carter # 5, 6 Joel Dison #5,6 Tony Reed #5,6 Lucius Burris #5,6 David Deerman #5,6 Clifford Shepard #5,6 Michael Smith #5,6 Lloyd Barnes SCGEM 5,6 Gary Miller SCGEM 5,6 Terry Crawley Southern Generation 5 Roger Green Southern Generation 5	x		
<u>FRCC Op, Eng &amp; Mkt Int</u> Linda Campbell FRCC #2		x	

**Draft Comments and Considerations for 2<sup>nd</sup> Posting for Operate Within IROLs Standard Requirement 204 - Actions**

Paul Elwing Lakeland Electric # 3 John Shaffer FPL #1 Bob Remley Clay Elec Coop #4 Patti Metro FRCC #2 Eirc Grant Progress Energy – FL #1 Joe Roos Ocala Electric Utility #3 Joe Krupar FL Muni Pwr Agency #3 Richard Gilbert Lakeland Electric #3 Bill Slater Progress Energy – FL #1 Amy Long Lakeland Electric #1 Roger Westphal Gainesville Regional Util #5 Bob Goss SEPA #5 Steve Wallace Seminore Electric Coop #4 Ted Hobson JEA #1			
Kathleen Goodman ISO-NE #2		x	

**Draft Comments and Considerations for 2<sup>nd</sup> Posting for Operate Within IROLs Standard Requirement 204 - Actions**

**Requirement 204 - Actions - Do you agree with the measures**

Commenter	Yes	No	Comments
Ken Githens Allegheny Energy Supply #5	x		
William Smith Allegheny Power #1	x		
Stuart Goza TVA #1	x		
<u>NPCC CP9</u> Michael Schiavone National Grid USA #1 Roger Champagne Hydro-Quebec TransEnergie #1 Ralph Rufrano New York Power Authority #1 David Little Nova Scotia Power Inc. #1 David Kiguel Hydro One Networks #1 Michael Potishnak ISO-New England #2 Barry Gee National Grid USA #1 Dan Stosick ISO-New England #2 Fernando Saavedra ISO-New England #2 Greg Campoli New York ISO #2	x		
<u>Southern Co Transmission Planning #1</u> Todd Lucas Southern Co Joe Payne Mississippi Power Company Travis Koval Southern Co Bill Pope Gulf Power Company John Clark Southern Co David Johnson Savannah Electric Mike Miller Southern Co Jim Griffith Southern Co Monroe Landrum Southern Co	x		
Peter Burke ATC #1	x		
Charles Yeung Reliant #5	x		
Gerald Rheault Manitoba Hydro #1, 3, 5, 6	x		
Alan Boesch NPPD #1	x		
Dan Boezio & Raj Rana AEP #1, 3, 5, 6	x		
Raymond Mammarella PPL Elec Util #1	x		
Tom Pruitt Duke Power #1	x		
Tony Jankowski We Energies #4	x		
Michael Sidiropoulos Pacificorp	x		

**Draft Comments and Considerations for 2<sup>nd</sup> Posting for Operate Within IROLs Standard Requirement 204 - Actions**

<u>Operating Reliability Working Group SPP</u> Gerry Burrows KCP&L #1 Bob Cochran SPS #1 Peter Kuebeck OG&E #1 Scott Moore AEP #1 Tom Stuchlik Westar #1 Dan Boezio AEP #1 Matt Bordelon CLECO #1 Mike Crouch WFEC #1 Mike Gammon KCP&L #1 Kevin Goolsby SPP #2 Bo Jones Westar #1 Allen Klassen Westar #1 Thad Ness AEP #1 Harold Wyble KCP&L #1 Robert Rhodes SPP #2	x		
Robert Grover PPL Elec Util #3	x		
John Horakh MAAC #2	x		
<u>BPA Adm TBL #1</u> James Murphy Mike Viles James Randall Al Johnson Jeff Newby Jim Gronquist Sylvia Wiggerhaus Brian Tuck Dick Spence Tracy Rolstad Steve Hitchens	x		
Darrell Richardson Illinois Power #1, 3	x		
David Thorne Pepco #1	x		
Ed Davis Entergy Services #1	x		
Albert DiCaprio MAAC #2	x		
Alan Johnson Mirant Americas Energy Mktg #6	x		
Mark Heimbach PPL Generation #6	x		
<u>Centerpoint Energy #1</u> Richard Sikes	x		

**Draft Comments and Considerations for 2<sup>nd</sup> Posting for Operate Within IROLs Standard Requirement 204 - Actions**

John Jonte Wayne Kemper Glenn Hemperley Brad Calhoun			
<u>Southern Company Generation &amp; Energy Mktg</u> Roman Carter # 5, 6 Joel Dison #5,6 Tony Reed #5,6 Lucius Burris #5,6 David Deerman #5,6 Clifford Shepard #5,6 Michael Smith #5,6 Lloyd Barnes SCGEM 5,6 Gary Miller SCGEM 5,6 Terry Crawley Southern Generation 5 Roger Green Southern Generation 5	x		
<u>Trans Subcommittee</u> Robert E. Reed PJM Daniel Cooper Michigan Public Power Agency Ken Donohoo ERCOT Michael Gildea Duke-Energy, North America Francis Halpin Bonneville Power Administration Tom Mallinger Midwest ISO Darrick Moe Western Area Power Adm Scott Moore American Electric Power Bill Slater Florida Power Corporation Tom Stuchlik Western Resources Joseph Styslinger Southern Company David Thorne D. H. Thorne Consultants, Inc Robert Waldele New York ISO Roman Carter Southern Company John Ahr Alleghany Power Systems Susan Morris SERC Ed Pfeiffer Ameren	x		

**Draft Comments and Considerations for 2<sup>nd</sup> Posting for Operate Within IROLs Standard Requirement 204 - Actions**

Ray Palmieri ECAR Tom Vandervort NERC			
Terry Bilke Midwest ISO #2		x	
<u>MAAP Ops Subcommittee #2</u> Llyod Linke MAPP Allan Silk Manitoba Hydro Paul Brune NPPD Tod Gosnell Omaha Public Pwr Dist Paul Koskela Minnesota Pwr Larry Larson Otter Tail Power Derrick Moe WAPA Dick Pursley Great River Energy Martin Trence Xcel Energy Joseph Knight MAPPCOR		x	
SERC Operations Planning Subcommittee Carter Edge SEPA #4, 5 William Gaither So Carolina Pub Serv Auth #1 Mike Miller Southern Co #1 Roger Brand Muni Elec Auth GA #1 Phil Creech Progress Energy – CP&L #1 Gene Delk So Carolina Elec & Gas #1 Al McMeekin So Carolina Elec & Gas #1 Greg Ott Alcoa-Yadkin #1 Doug Newbaue GA System Operations #1 Mike Clements TVA #1 Don Reichenbach Duke Energy #1 Lynna Estep SERC #2 Mark Creech TVA #1		x	
Susan Morris SERC #2 Bill Reinke SERC #2 Sam Stryker Fayettevill PWC #3, 4, 5 Carter Edge SEPA #4, 5 Bill Thompson Dominion Trans #1		x	
Kathleen Goodman ISO-NE #2		x	

**Draft Comments and Considerations for 2<sup>nd</sup> Posting for Operate Within IROLs Standard Requirement 204 - Actions**

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<p><u>FRCC Op, Eng &amp; Mkt Int</u>          Linda Campbell FRCC #2          Paul Elwing Lakeland Electric # 3          John Shaffer FPL #1          Bob Remley Clay Elec Coop #4          Patti Metro FRCC #2          Eirc Grant Progress Energy – FL #1          Joe Roos Ocala Electric Utility #3          Joe Krupar FL Muni Pwr Agency #3          Richard Gilbert Lakeland Electric #3          Bill Slater Progress Energy – FL #1          Amy Long Lakeland Electric #1          Roger Westphal Gainesville Regional Util #5          Bob Goss SEPA #5          Steve Wallace Seminore Electric Coop #4          Ted Hobson JEA #1</p>		<p>x</p>	
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**Draft Comments and Considerations for 2<sup>nd</sup> Posting for Operate Within IROLs Standard Requirement 204 - Actions**

**Requirement 204 - Actions - Do you agree with the compliance monitoring process?**

Commenter	Yes	No	Comments
Ken Githens Allegheny Energy Supply #5	x		
William Smith Allegheny Power #1	x		
<u>NPCC CP9</u> Michael Schiavone National Grid USA #1 Roger Champagne Hydro-Quebec TransEnergie #1 Ralph Rufrano New York Power Authority #1 David Little Nova Scotia Power Inc. #1 David Kiguel Hydro One Networks #1 Michael Potishnak ISO-New England #2 Barry Gee National Grid USA #1 Dan Stosick ISO-New England #2 Fernando Saavedra ISO-New England #2 Greg Campoli New York ISO #2	x		
<u>Southern Co Transmission Planning #1</u> Todd Lucas Southern Co Joe Payne Mississippi Power Company Travis Koval Southern Co Bill Pope Gulf Power Company John Clark Southern Co David Johnson Savannah Electric Mike Miller Southern Co Jim Griffith Southern Co Monroe Landrum Southern Co	x		
Peter Burke ATC #1	x		
Charles Yeung Reliant #5	x		
Gerald Rheault Manitoba Hydro #1, 3, 5, 6	x		
<u>FRCC Op, Eng &amp; Mkt Int</u> Linda Campbell FRCC #2 Paul Elwing Lakeland Electric #3 John Shaffer FPL #1 Bob Remley Clay Elec Coop #4 Patti Metro FRCC #2 Eirc Grant Progress Energy – FL #1 Joe Roos Ocala Electric Utility #3	x		



**Draft Comments and Considerations for 2<sup>nd</sup> Posting for Operate Within IROLs Standard Requirement 204 - Actions**

Joe Krupar FL Muni Pwr Agency #3 Richard Gilbert Lakeland Electric #3 Bill Slater Progress Energy – FL #1 Amy Long Lakeland Electric #1 Roger Westphal Gainesville Regional Util #5 Bob Goss SEPA #5 Steve Wallace Seminore Electric Coop #4 Ted Hobson JEA #1			
Alan Boesch NPPD #1	x		
Dan Boezio & Raj Rana AEP #1, 3, 5, 6	x		
Raymond Mammarella PPL Elec Util #1	x		
Tom Pruitt Duke Power #1	x		
Tony Jankowski We Energies #4	x		
Michael Sidiropoulos Pacificorp	x		
Robert Grover PPL Elec Util #3	x		
<u>MAAP Ops Subcommittee #2</u> Llyod Linke MAPP Allan Silk Manitoba Hydro Paul Brune NPPD Tod Gosnell Omaha Public Pwr Dist Paul Koskela Minnesota Pwr Larry Larson Otter Tail Power Derrick Moe WAPA Dick Pursley Great River Energy Martin Trencé Xcel Energy Joseph Knight MAPPCOR	x		
John Horakh MAAC #2	x		
<u>BPA Adm TBL #1</u> James Murphy Mike Viles James Randall Al Johnson Jeff Newby Jim Gronquist Sylvia Wiggerhaus Brian Tuck Dick Spence Tracy Rolstad	x		

**Draft Comments and Considerations for 2<sup>nd</sup> Posting for Operate Within IROLs Standard Requirement 204 - Actions**

Steve Hitchens			
Darrell Richardson Illinois Power #1, 3	x		
David Thorne Pepco #1	x		
Ed Davis Entergy Services #1	x		
Albert DiCaprio MAAC #2	x		
Alan Johnson Mirant Americas Energy Mktg #6	x		
Mark Heimbach PPL Generation #6	x		
<u>Centerpoint Energy #1</u> Richard Sikes John Jonte Wayne Kemper Glenn Hemperley Brad Calhoun	x		
<u>Trans Subcommittee</u> Robert E. Reed PJM Daniel Cooper Michigan Public Power Agency Ken Donohoo ERCOT Michael Gildea Duke-Energy, North America Francis Halpin Bonneville Power Administration Tom Mallinger Midwest ISO Darrick Moe Western Area Power Adm Scott Moore American Electric Power Bill Slater Florida Power Corporation Tom Stuchlik Western Resources Joseph Styslinger Southern Company David Thorne D. H. Thorne Consultants, Inc Robert Waldele New York ISO Roman Carter Southern Company John Ahr Alleghany Power Systems Susan Morris SERC Ed Pfeiffer Ameren Ray Palmieri ECAR Tom Vandervort NERC	x		

**Draft Comments and Considerations for 2<sup>nd</sup> Posting for Operate Within IROLs Standard Requirement 204 - Actions**

<p><u>Southern Company Generation &amp; Energy Mktg</u>  Roman Carter # 5, 6  Joel Dison #5,6  Tony Reed #5,6  Lucius Burris #5,6  David Deerman #5,6  Clifford Shepard #5,6  Michael Smith #5,6  Lloyd Barnes SCGEM 5,6  Gary Miller SCGEM 5,6  Terry Crawley Southern Generation 5  Roger Green Southern Generation 5</p>	<p>x</p>		
<p><u>Compliance Subcommittee</u></p>			<p>Change 4.1 to: The responsible entity shall demonstrate compliance to the compliance monitor within the first year that this standard becomes effective or the first year the entity commences operation by information submittal to the compliance monitor, either on or off site at the compliance monitors discretion.  Add new 4.2 Subsequent to the initial compliance review, compliance will be re-verified at least every three years using a scheduled on-site review method or un-scheduled (investigation) method, review of information submitted as requested, or through self-certification, at the discretion of the compliance monitor.  Re-number 4.2 and 4.3 to 4.3 and 4.4</p>
<p>The suggested language changes were not adopted for the following reasons.</p> <ul style="list-style-type: none"> <li>- "Information submittal" is an undefined term. Industry commenters have asked that the compliance elements be as specific as possible so that there won't be huge variations from region to region in the application of the compliance monitoring. If an 'information submittal' is the same as a self-certification document, then this is already covered in the original language. Including language that gives each compliance monitor the flexibility to assess this requirement however it chooses, does not conform with the industry's requests for standardization in the compliance monitoring process.</li> </ul> <p>The only significant change between the original language and the proposed new section 4.2 is the addition of the concept that the compliance monitor has the freedom to either conduct an audit per a schedule, or just show up unscheduled. Again, this does not support the industry's request for increased standardization in the compliance monitoring process. The original language included the option of conducting an 'investigation upon compliant' and this seems more appropriate than unscheduled audits.</p>			
<p>Terry Bilke Midwest ISO #2</p>		<p>x</p>	
<p>Stuart Goza TVA #1</p>		<p>x</p>	
<p><u>Operating Reliability Working Group SPP</u></p>		<p>x</p>	

**Draft Comments and Considerations for 2<sup>nd</sup> Posting for Operate Within IROLs Standard Requirement 204 - Actions**

Gerry Burrows KCP&L #1 Bob Cochran SPS #1 Peter Kuebeck OG&E #1 Scott Moore AEP #1 Tom Stuchlik Westar #1 Dan Boezio AEP #1 Matt Bordelon CLECO #1 Mike Crouch WFEC #1 Mike Gammon KCP&L #1 Kevin Goolsby SPP #2 Bo Jones Westar #1 Allen Klassen Westar #1 Thad Ness AEP #1 Harold Wyble KCP&L #1 Robert Rhodes SPP #2			
SERC Operations Planning Subcommittee Carter Edge SEPA #4, 5 William Gaither So Carolina Pub Serv Auth #1 Mike Miller Southern Co #1 Roger Brand Muni Elec Auth GA #1 Phil Creech Progress Energy – CP&L #1 Gene Delk So Carolina Elec & Gas #1 Al McMeekin So Carolina Elec & Gas #1 Greg Ott Alcoa-Yadkin #1 Doug Newbaue GA System Operations #1 Mike Clements TVA #1 Don Reichenbach Duke Energy #1 Lynna Estep SERC #2 Mark Creech TVA #1		x	
Susan Morris SERC #2 Bill Reinke SERC #2 Sam Stryker Fayettevill PWC #3, 4, 5 Carter Edge SEPA #4, 5 Bill Thompson Dominion Trans #1		x	
Kathleen Goodman ISO-NE #2		x	

**Draft Comments and Considerations for 2<sup>nd</sup> Posting for Operate Within IROLs Standard Requirement 204 - Actions**

**Requirement 204 - Actions - Do you agree with the levels of non-compliance?**

Commenter	Yes	No	Comments
Ken Githens Allegheny Energy Supply #5	x		
William Smith Allegheny Power #1	x		
<u>NPCC CP9</u> Michael Schiavone National Grid USA #1 Roger Champagne Hydro-Quebec TransEnergie #1 Ralph Rufrano New York Power Authority #1 David Little Nova Scotia Power Inc. #1 David Kiguel Hydro One Networks #1 Michael Potishnak ISO-New England #2 Barry Gee National Grid USA #1 Dan Stosick ISO-New England #2 Fernando Saavedra ISO-New England #2 Greg Campoli New York ISO #2	x		
<u>Southern Co Transmission Planning #1</u> Todd Lucas Southern Co Joe Payne Mississippi Power Company Travis Koval Southern Co Bill Pope Gulf Power Company John Clark Southern Co David Johnson Savannah Electric Mike Miller Southern Co Jim Griffith Southern Co Monroe Landrum Southern Co	x		
Peter Burke ATC #1	x		
Charles Yeung Reliant #5	x		
Susan Morris SERC #2 Bill Reinke SERC #2 Sam Stryker Fayettevill PWC #3, 4, 5 Carter Edge SEPA #4, 5 Bill Thompson Dominion Trans #1	x		
Gerald Rheault Manitoba Hydro #1, 3, 5, 6	x		
Dan Boezio & Raj Rana AEP #1, 3, 5, 6	x		
Raymond Mammarella PPL Elec Util #1	x		

**Draft Comments and Considerations for 2<sup>nd</sup> Posting for Operate Within IROLs Standard Requirement 204 - Actions**

Tom Pruitt Duke Power #1	x		
Tony Jankowski We Energies #4	x		
Michael Sidiropoulos PacifiCorp	x		
Robert Grover PPL Elec Util #3	x		
<u>MAAP Ops Subcommittee #2</u> Llyod Linke MAPP Allan Silk Manitoba Hydro Paul Brune NPPD Tod Gosnell Omaha Public Pwr Dist Paul Koskela Minnesota Pwr Larry Larson Otter Tail Power Derrick Moe WAPA Dick Pursley Great River Energy Martin Trence Xcel Energy Joseph Knight MAPPCOR	x		
John Horakh MAAC #2	x		
<u>BPA Adm TBL #1</u> James Murphy Mike Viles James Randall Al Johnson Jeff Newby Jim Gronquist Sylvia Wiggerhaus Brian Tuck Dick Spence Tracy Rolstad Steve Hitchens	x		
Darrell Richardson Illinois Power #1, 3	x		
David Thorne Pepco #1	x		
Ed Davis Entergy Services #1	x		
<u>SERC Operations Planning Subcommittee</u> Carter Edge SEPA #4, 5 William Gaither So Carolina Pub Serv Auth #1 Mike Miller Southern Co #1 Roger Brand Muni Elec Auth GA #1 Phil Creech Progress Energy – CP&L #1 Gene Delk So Carolina Elec & Gas #1	x		

**Draft Comments and Considerations for 2<sup>nd</sup> Posting for Operate Within IROLs Standard Requirement 204 - Actions**

Al McMeekin So Carolina Elec & Gas #1 Greg Ott Alcoa-Yadkin #1 Doug Newbaue GA System Operations #1 Mike Clements TVA #1 Don Reichenbach Duke Energy #1 Lynna Estep SERC #2 Mark Creech TVA #1			
Albert DiCaprio MAAC #2	x		
Alan Johnson Mirant Americas Energy Mktg #6	x		
Mark Heimbach PPL Generation #6	x		
<u>Centerpoint Energy #1</u> Richard Sikes John Jonte Wayne Kemper Glenn Hemperley Brad Calhoun	x		
<u>Southern Company Generation &amp; Energy Mktg</u> Roman Carter # 5, 6 Joel Dison #5,6 Tony Reed #5,6 Lucius Burris #5,6 David Deerman #5,6 Clifford Shepard #5,6 Michael Smith #5,6 Lloyd Barnes SCGEM 5,6 Gary Miller SCGEM 5,6 Terry Crawley Southern Generation 5 Roger Green Southern Generation 5	x		
Stuart Goza TVA #1		x	
Alan Boesch NPPD #1		x	
<u>FRCC Op, Eng &amp; Mkt Int</u> Linda Campbell FRCC #2 Paul Elwing Lakeland Electric # 3		x	

**Draft Comments and Considerations for 2<sup>nd</sup> Posting for Operate Within IROLs Standard Requirement 204 - Actions**

John Shaffer FPL #1 Bob Remley Clay Elec Coop #4 Patti Metro FRCC #2 Eirc Grant Progress Energy – FL #1 Joe Roos Ocala Electric Utility #3 Joe Krupar FL Muni Pwr Agency #3 Richard Gilbert Lakeland Electric #3 Bill Slater Progress Energy – FL #1 Amy Long Lakeland Electric #1 Roger Westphal Gainesville Regional Util #5 Bob Goss SEPA #5 Steve Wallace Seminore Electric Coop #4 Ted Hobson JEA #1			
Terry Bilke Midwest ISO #2		x	
<u>Operating Reliability Working Group SPP</u> Gerry Burrows KCP&L #1 Bob Cochran SPS #1 Peter Kuebeck OG&E #1 Scott Moore AEP #1 Tom Stuchlik Westar #1 Dan Boezio AEP #1 Matt Bordelon CLECO #1 Mike Crouch WFEC #1 Mike Gammon KCP&L #1 Kevin Goolsby SPP #2 Bo Jones Westar #1 Allen Klassen Westar #1 Thad Ness AEP #1 Harold Wyble KCP&L #1 Robert Rhodes SPP #2		x	
Kathleen Goodman ISO-NE #2		x	



**Draft Comments and Considerations for 2<sup>nd</sup> Posting for Operate Within IROLs Standard Requirement 204 - Actions**

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**Requirement 204 - Actions – Other comments**

**Summary Consideration:** While there were many comments recommending specific changes, most commenters indicated support of the requirement, its measures and compliance elements. There were several suggestions for changing the levels of non-compliance so they better align with the measures. The following changes were made to further improve the level of consensus on this requirement:

- The requirement was revised to clarify how to measure the duration of an ‘event’.
- To conform with the requested changes to the definition of  $T_v$ , the requirement was changed to clarify that only instances of exceeding (rather than meeting or exceeding) the  $T_v$  need to be reported to the compliance monitor.
- The measures were revised to add more explanatory text to clarify the circumstances under which the measure is applicable
- The compliance monitoring process was modified to change the performance reset period to ‘12 months from the last violation’.
- Levels of non-compliance were adjusted to conform to the new language used for  $T_v$

The SDT was unable to accommodate the changes recommending that the RA be exempt from sanctions if the RA directed to take actions, but those actions did not achieve the desired results and an IROL was exceeded for a time greater than  $T_v$ . The industry is divided on this issue – and 20 of the 125 respondents indicated a preference for exempting the RA from sanctions if the RA directed others to take action and those actions either weren’t taken or didn’t achieve the desired results.

The SDT was unable to accommodate the changes recommending that the RA not be held accountable for exceeding an IROL. Several commenters indicated that the measures require only documentation and reporting, and don’t address instances of exceeding an IROL. Measures are elements the Compliance Managers use to determine if the requirement has been met. The Compliance Managers do not have access to the real-time data that would indicate instances of approaching or exceeding IROLs. The documentation and reports required in the measures are the physical evidence the compliance managers need to assess compliance with the requirement. The requirement clearly indicates that the RA shall act or direct others to act to prevent or mitigate instances of exceeding IROLs and shall document these actions.

Commenter	Comments
Terry Bilke Midwest ISO #2	<p>In this section, the RA gets a level 4 compliance violation if a limit is exceeded, the RA takes action and the limit is exceeded for <math>T_v</math>. It appears the RA is accountable if they take timely action (direct corrective measures) and the other authorities (IA, BA, TO) fail to respond.</p> <p>Also it appears that the same penalty is assessed whether the RA failed to act for one event or 100 events for the year.</p>
<p>The seriousness of exceeding an IROL for a time greater than the IROL’s <math>T_v</math> seems to warrant a serious sanction. An IROL should not be exceeded for any length of time. In this posting cycle, the SDT provided its reasoning for having this infraction be a level four non-compliance, and most of the commenters indicated support for this position.</p> <p>The compliance sanctions table is multidimensional and is built to apply more stringent sanctions for successive instances of non-compliant behavior within a performance reset period. The sanction applied for a single instance of exceeding an IROL for time greater than <math>T_v</math> is much less than for the fourth instance in a 12 month period.</p>	
Stuart Goza TVA #1	RA should only be penalized if the RA failed to direct action. If an operating entity fails to implement the directed action then the RA should not be penalized (if the RA does not have direct operational control.)

**Draft Comments and Considerations for 2<sup>nd</sup> Posting for Operate Within IROLs Standard Requirement 204 - Actions**

	<p>Section 5.4 should be amended to include “and RA failed to direct action.”</p> <p>Generally, the Measures should be tied to the Requirements and the Objective Evidence for Compliance (OEC) should be tied to the Measures.</p> <p>Section 4.3 should be re-written to read:</p> <p style="padding-left: 40px;">4.3. The reliability authority shall have the following available upon the request of its compliance monitor:</p> <p style="padding-left: 80px;">4.3.1. Operations logs or other documentation <b>in accordance with Measure 2.1</b> and the actions or directives issued for each of these instances</p> <p style="padding-left: 80px;">4.3.2. Interconnection Reliability Operating Limit Violation Reports <b>completed in accordance with Measure 2.2</b></p>
<p>Under the Functional Model, the RA has ultimate responsibility for reliability of the bulk electric system. The RA needs to have agreements in place with the entities operating under the RA’s direction as part of the RA Certification process – and these agreements need to address the RA’s authority with respect to these other entities. Most of the industry commenters agreed that the RA should be held responsible when an IROL is exceeded for a time greater than <math>T_v</math>. If the RA’s directives are not followed, the entities involved are subject to sanctions under this standard’s Requirement 208 – RA Directives.</p> <p>The suggested format change was not adopted. The standards have been drafted to be as succinct as possible – and the additional words do not add anything to the standard. In addition, when the standards are completed, they will be available to the industry in a relational database with search capabilities. If the suggested cross-referencing were adopted, and someone downloaded a report that listed just the compliance elements for this standard, the cross references would lead the reader to believe that additional information could be found in the measures – and in many cases this is not true.</p>	
<p><u>NPCC CP9</u>  Michael Schiavone National Grid USA #1  Roger Champagne Hydro-Quebec TransEnergie #1  Ralph Rufrano New York Power Authority #1  David Little Nova Scotia Power Inc. #1  David Kiguel Hydro One Networks #1  Michael Potishnak ISO-New England #2  Barry Gee National Grid USA #1  Dan Stosick ISO-New England #2  Fernando Saavedra ISO-New England #2  Greg Campoli New York ISO #2</p>	<p>NPCC also suggests adding “footnote 1” that appears on page 10 to the Level one non-compliance measure to capture the thought that no overt action is sometimes an acceptable action</p>
<p>The footnote was added to the heading for the levels of non-compliance.</p>	

**Draft Comments and Considerations for 2<sup>nd</sup> Posting for Operate Within IROLs Standard Requirement 204 - Actions**

<p>Susan Morris SERC #2          Bill Reinke SERC #2          Sam Stryker Fayettevill PWC #3, 4, 5          Carter Edge SEPA #4, 5          Bill Thompson Dominion Trans #1</p> <p><u>SERC Operations Planning Subcommittee</u>          Carter Edge SEPA #4, 5          William Gaither So Carolina Pub Serv Auth #1          Mike Miller Southern Co #1          Roger Brand Muni Elec Auth GA #1          Phil Creech Progress Energy – CP&amp;L #1          Gene Delk So Carolina Elec &amp; Gas #1          Al McMeekin So Carolina Elec &amp; Gas #1          Greg Ott Alcoa-Yadkin #1          Doug Newbaue GA System Operations #1          Mike Clements TVA #1          Don Reichenbach Duke Energy #1          Lynna Estep SERC #2          Mark Creech TVA #1</p>	<ol style="list-style-type: none"> <li>1. We have a general concern that the Reliability Authority is the only function held responsible for instances where the IROL is exceeded. Currently, not all RAs have operating responsibility over their systems. Some functions are delegated. With this in mind, the levels of non-compliance would pertain only to RAs, while they may not have direct control. For instance, the operating entities could choose not to follow the RA’s direction. It seems that there should be a complementary standard that would penalize operating entities for not adhering to the direction of the RA. The penalties should be ranked according to the severity of the situation. In other words, the entities that actually have the operating responsibility must be held accountable.</li> <li>2. Has the Interconnection Reliability Operating Limit Violation Report been developed yet? Is this the existing NERC Operating Policy 5, Appendix 5F as modified with the results of the Reliability Coordinator IRLV Field Test? Will this report become part of this standard?</li> <li>3. Generally, the Measures should be tied to the Requirements and the Objective Evidence for Compliance (OEC) should be tied to the Measures.</li> <li>4. In section 2, the measures do not capture the requirement to PREVENT instances where IROLs may be exceeded. The following re-wording is suggested. Section 4, below is also slightly modified to align with change in the measurement.</li> </ol> <p style="color: red;">The reliability authority shall document each instance where actions are taken to prevent exceeding or to mitigate the magnitude and duration of interconnection reliability operating limit:</p> <p>The reliability authority shall document, via an operations log or other data source, the actions taken or directives issued, the magnitude of the event, and the duration of the event. (This data may be from an operating log, may be from the entity’s energy management system, or may be from some other source.)</p> <p>2.2. The reliability authority shall report each instance of exceeding an interconnection reliability operating limit for time greater than or equal to Tv:</p> <p>2.2.1. The reliability authority shall complete an Interconnection Reliability Operating Limit Violation Report and shall file the report with its compliance monitor within five</p>
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**Draft Comments and Considerations for 2<sup>nd</sup> Posting for Operate Within IROLs Standard Requirement 204 - Actions**

	<p>business days of the initiation of the event. (The report includes the date and time of the event, identification of which interconnection reliability operating limit was violated and the Tv for that limit, magnitude and duration of exceeding the interconnection reliability operating limit, actions taken or directives issued, and explanation of results of actions or directives.)</p> <p>The reliability authority shall have the following available upon the request of its compliance monitor: Operations logs or other documentation in accordance with Measure 2.1 indicating the magnitude and duration of each interconnection reliability operating limit event and the actions or directives issued for each of these instances</p> <p>4.3.2. Interconnection Reliability Operating Limit Violation Reports completed in accordance with Measure 2.2</p>
<ol style="list-style-type: none"> <li>1. Requirement 208 of this standard requires that the entities supporting the RA follow the RA's directives. If those entities fail to follow the RA's directives, they would be sanctioned under Requirement 208, so if an IROL is exceeded for a time greater than that IROL's T<sub>v</sub>, the RA is not necessarily the only entity that would be subject to sanctions. It is also envisioned that the RA will have contractual relationships with BAs and others to perform as instructed.</li> <li>2. The IROL Violation Report is a compliance document and has been developed for the Compliance Monitors. The report will be appended to the end of this document so that everyone can see the report. The report was not made part of this standard because in the future there may be automated systems that could be used to simplify the reporting process, and we didn't want to have to update this standard just to accommodate that improvement. The IROL Violation Report does not ask for any data that isn't identified in the standard. The IROL Violation Report is not an exact duplication of the report currently found in Appendix 5F, and is not an exact duplication of the report currently being field tested by the OLDTF. The report in Appendix 5F and the report being field tested by the OLDT both ask for more data than is needed by the Compliance Monitor, and is outside the scope of this standard.</li> <li>3. The suggested format change was not adopted. The standards have been drafted to be as succinct as possible – and the additional words do not add anything to the standard. In addition, when the standards are completed, they will be available to the industry in a relational database with search capabilities. If the suggested cross-referencing were adopted, and someone downloaded a report that listed just the compliance elements for this standard, the cross references would lead the reader to believe that additional information could be found in the measures –and in many cases this is not true.</li> <li>4. The recommended change to measure 2.1 would require a great deal of data collection and was not adopted. System Operators are continually working to prevent instances of exceeding IROLs.</li> </ol>	
<p>FRCC Op, Eng &amp; Mkt Int Linda Campbell FRCC #2 Paul Elwing Lakeland Electric # 3 John Shaffer FPL #1 Bob Remley Clay Elec Coop #4</p>	<ol style="list-style-type: none"> <li>1. Both requirement 1.2 and measure 2.2 are about reporting IROL violations when the time is greater than or equal to Tv. We do not agree with the equal to portion of this. To us, Tv is analogous to a speed limit. You would not report if you were equal, but only if in excess. We do not understand the reasoning for equal to being included.</li> <li>2. We do not agree with the levels of non-compliance because level 4 is based on an</li> </ol>

**Draft Comments and Considerations for 2<sup>nd</sup> Posting for Operate Within IROLs Standard Requirement 204 - Actions**

<p>Patti Metro FRCC #2          Eirc Grant Progress Energy – FL #1          Joe Roos Ocala Electric Utility #3          Joe Krupar FL Muni Pwr Agency #3          Richard Gilbert Lakeland Electric #3          Bill Slater Progress Energy – FL #1          Amy Long Lakeland Electric #1          Roger Westphal Gainesville Regional Util #5          Bob Goss SEPA #5          Steve Wallace Seminore Electric Coop #4          Ted Hobson JEA #1</p>	<p>IROL being exceeded for a time greater or equal to Tv. This does not agree with the measures listed. The measures are to document actions taken or report violations that occurred. The levels of non-compliance should be based on what we are measuring. Please see our earlier comments on Section 6 - sanctions.</p> <p>3. This requirement in particular brought a question to mind about what the RA really is. Does this requirement assume the RA is the Reliability Coordinator of today who looks at "the big picture", or does it mean today's control area operator? It is still unclear to us what the RA really is. Is there a hole in the functional model that needs to be filled? We do not think we are the only participants in the industry still confused, so work needs to be done to clarify exactly who or what the RA is.</p>
<p>1. Your suggestion for revising the T<sub>v</sub> so this was a limit you could meet but not exceed was adopted and is reflected in the revised definition for Tv as well as in the language in this requirement.</p> <p>2. Measures are an indication that the compliance managers can use to determine if the requirement's performance has been met. The Compliance Managers do not have access to the real-time data that would indicate instances of approaching or exceeding IROLs. The documentation and reports are the physical evidence the compliance managers need to assess compliance with the requirement. The requirement clearly indicates that the RA shall act or direct others to act to prevent or mitigate instances of exceeding IROLs.</p> <p>3. The work that needs to be done in clarifying the Functional Model needs to be done by the Functional Model Review Task Group and is outside the scope of the SDT.</p>	
<p>Alan Boesch NPPD #1</p>	<p>The level four non-compliance does not match the measure. The measure only requires a report and does not hold the RA responsible for exceeding the operating limit.</p>
<p>Measures are an indication that the compliance managers can use to determine if the requirement's performance has been met. The Compliance Managers do not have access to the real-time data that would indicate instances of approaching or exceeding IROLs. The documentation and reports are the physical evidence the compliance managers need to assess compliance with the requirement. The requirement clearly indicates that the RA shall act or direct others to act to prevent or mitigate instances of exceeding IROLs.</p>	
<p>Carter Edge SEPA #4, 5</p>	<p>Has the Interconnection Reliability Operating Limit Violation Report been developed yet? Is this the existing NERC Operating Policy 5, Appendix 5F as modified with the results of the Reliability Coordinator IRLV Field Test?</p> <p>Generally, the Measures should be tied to the Requirements and the Objective Evidence for Compliance (OEC) should be tied to the Measures.</p> <p>4.3. The reliability authority shall have the following available upon the request of its compliance monitor:</p>

**Draft Comments and Considerations for 2<sup>nd</sup> Posting for Operate Within IROLs Standard Requirement 204 - Actions**

	<p>Operations logs or other documentation <b>in accordance with Measure 2.1</b> indicating the magnitude and duration of each instance of exceeding an interconnection reliability operating limit and the actions or directives issued for each of these instances</p> <p>Interconnection Reliability Operating Limit Violation Reports <b>completed in accordance with Measure 2.2</b></p> <p>Level four: non-compliance is not supported by either the Measures or the Compliance Monitoring Process. We understand there is a desire by some in the industry to hold the Reliability Authority accountable for Interconnection Reliability Operating Limit Violations, however, as written, this standard does not support it. Section 5.4 should be rewritten to read:</p> <p>5.4. Level four: Interconnection reliability operating limit exceeded for time greater than or equal to Tv minutes and either: no documentation to indicate actions taken or directives issued to mitigate the instance, or no Interconnection Reliability Operating Limit Violation Report completed and filed with its compliance monitor</p>
<p>The IROL Violation Report is a compliance document and has been developed for the Compliance Monitors. The report will be appended to the end of this document so that everyone can see the report. The report was not made part of this standard because in the future there may be automated systems that could be used to simplify the reporting process, and we didn't want to have to update this standard just to accommodate that improvement. The IROL Violation Report does not ask for any data that isn't identified in the standard. The IROL Violation Report is not an exact duplication of the report currently found in Appendix 5F, and is not an exact duplication of the report currently being field tested by the OLDTF. The report in Appendix 5F and the report being field tested by the OLDTF both ask for more data than is needed by the Compliance Monitor, and is outside the scope of this standard.</p>	
<p>The suggested format change was not adopted. The standards have been drafted to be as succinct as possible – and the additional words do not add anything to the standard. In addition, when the standards are completed, they will be available to the industry in a relational database with search capabilities. If the suggested cross-referencing were adopted, and someone downloaded a report that listed just the compliance elements for this standard, the cross references would lead the reader to believe that additional information could be found in the measures – and in many cases this is not true.</p>	
<p>Measures are an indication that the compliance managers can use to determine if the requirement's performance has been met. The Compliance Managers do not have access to the real-time data that would indicate instances of approaching or exceeding IROLs. The documentation and reports are the physical evidence the compliance managers need to assess compliance with the requirement. The requirement clearly indicates that the RA shall act or direct others to act to prevent or mitigate instances of exceeding IROLs.</p>	
<p>Dan Boezio &amp; Raj Rana AEP #1, 3, 5, 6</p>	<p>1. Defined terms should be capitalized, such as "Reliability Authority", "Operational Planning Analyses", "Interconnected Reliability Operating Limits", etc</p>
<p><b>The suggestion that defined terms be capitalized has been adopted and is reflected in the revised standard.</b></p>	

**Draft Comments and Considerations for 2<sup>nd</sup> Posting for Operate Within IROLs Standard Requirement 204 - Actions**

<p><u>Operating Reliability Working Group SPP</u>  Gerry Burrows KCP&amp;L #1  Bob Cochran SPS #1  Peter Kuebeck OG&amp;E #1  Scott Moore AEP #1  Tom Stuchlik Westar #1  Dan Boezio AEP #1  Matt Bordelon CLECO #1  Mike Crouch WFEC #1  Mike Gammon KCP&amp;L #1  Kevin Goolsby SPP #2  Bo Jones Westar #1  Allen Klassen Westar #1  Thad Ness AEP #1  Harold Wyble KCP&amp;L #1  Robert Rhodes SPP #2</p>	<p>The performance reset period should be changed to 12 months rather than one calendar year.  Non-compliance items should match the standard's definitions. Section 5.1 should be referred to as a Documentable Interconnection Reliability Operating Limit Violation. Section 5.2 should be referred to as an Interconnection Reliability Operating Limit Violation or a Reportable Interconnection Operating Limit Violation, whichever is correct (see response to Question 1).</p>
<p>There were several commenters who suggested changes to the reset period, and the standard was revised so that all requirements in this standard have the following language: "12 months from the last violation"</p> <p>The terms, Documentable IROL and Reportable IROL were not used in the last draft of this standard, and several commenters indicated it should be dropped. The terminology used in the levels of non-compliance matches the terminology used in the standard, so this suggestion was not adopted.</p>	
<p><u>MAAP Ops Subcommittee #2</u>  Llyod Linke MAPP  Allan Silk Manitoba Hydro  Paul Brune NPPD  Tod Gosnell Omaha Public Pwr Dist  Paul Koskela Minnesota Pwr  Larry Larson Otter Tail Power  Derrick Moe WAPA  Dick Pursley Great River Energy  Martin Trencé Xcel Energy  Joseph Knight MAPPCOR</p>	<p>The Measure 2.1.1 should include the explicit provision that this log is a publicly available document. The actions so logged by the RA should be independent and consistent, and the log is one way of enhancing visibility to assure this is the case.</p>
<p>There is no reliability-related reason to make this a public document, and this change was not adopted.</p>	

**Draft Comments and Considerations for 2<sup>nd</sup> Posting for Operate Within IROLs Standard Requirement 204 - Actions**

<p><u>BPA Adm TBL #1</u>          James Murphy      Mike Viles          James Randall      Al Johnson          Jeff Newby          Jim Gronquist          Sylvia Wiggerhaus   Brian Tuck          Dick Spence        Tracy Rolstad          Steve Hitchens</p>	<p>5.4 Remove minutes, TV may be seconds and TV is already a time period by definition.</p>
<p><b>Agreed. The revised standard reflects this change.</b></p>	
<p>Kathleen Goodman ISO-NE #2</p>	<p>ISO-NE also suggests adding “footnote 1” that appears on page 10 to the Level one non-compliance measure to capture the thought that no overt action is sometimes an acceptable action.</p> <p>ISO New England does not believe that we should identify specific limits which must be reported on. Rather, we advocate internally reporting on every violation which does not clear within 30 minutes (as defined in NERC policy). Subsequently, each reported violation will be studied/examined to see if it would have caused instability, uncontrolled separation, or cascading outages that adversely impact the reliability of the bulk power transmission system (have an Inter-Area impact outside of the New England Area following next contingency). If so, ISO New England would report this "OSL violation" to NPCC and NERC within 72 hours. If there would not have been an Inter-Area impact (i.e. the impact would have been localized within the offending Control Area's boundary), no external reporting will occur. We suggest this approach be adopted.</p> <p>By restricting reporting to pre-identified limits, NERC may not be getting the information they seek through this Standard. Only through a post-operational assessment, can a true analysis (with the correct system configuration) be performed and an adequate judgement be made on the potential impact to the bulk power system.</p> <p>We also believe that data should not be archived unless the limit is not cleared within 30 minutes. We do not advocate archiving data for every limit violation if it cleared in less than 30 minutes.</p>



## Draft Comments and Considerations for 2<sup>nd</sup> Posting for Operate Within IROLs Standard Requirement 204 - Actions

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The footnote was added to the heading for the levels of non-compliance.

This standard is based on the assumption that while all system operating limits are important, a subset of limits is most critical to the reliability of the interconnection, and exceeding these limits could lead to voltage instability, cascading outages, or uncontrolled separation. By identifying these limits in advance, system operators can pay extra attention to these limits, and can be better prepared to take (or direct) actions to prevent and mitigate instances of exceeding these limits. Some of these limits really shouldn't be exceeded for 30 minutes – and that is one of the reasons why the industry supported modifying the language that is in current Operating Policy, and allowing each RA to establish a  $T_v$  that is most appropriate to each limit.

The decision on whether or not to report an instance of exceeding an IROL is based on the length of time the IROL was exceeded. Lists of IROLs are not expected to remain static – these must be updated to conform with changes to the system.

When an IROL is exceeded, the documentation required is that which is typically found on the system operations log, and shouldn't require any additional effort to develop. Many entities keep operations logs for an indefinite period of time – and this standard requires keeping the data for just 3 years to ensure that there is some data on site when the Compliance Monitor conducts a scheduled audit once every 3 years.

**Draft Comments and Considerations for 2<sup>nd</sup> Posting for Operate Within IROLs Standard Requirement 205 – Data Specification**

**Requirement 205 - Data Specification - Do you agree with the requirement?**

Commenter	Yes	No	Comments
Kathleen Goodman ISO-NE #2	x		
Terry Bilke Midwest ISO #2	x		
Ken Githens Allegheny Energy Supply #5	x		
William Smith Allegheny Power #1	x		
Stuart Goza TVA #1	x		
<u>NPCC CP9</u> Michael Schiavone National Grid USA #1 Roger Champagne Hydro-Quebec TransEnergie #1 Ralph Rufrano New York Power Authority #1 David Little Nova Scotia Power Inc. #1 David Kiguel Hydro One Networks #1 Michael Potishnak ISO-New England #2 Barry Gee National Grid USA #1 Dan Stosick ISO-New England #2 Fernando Saavedra ISO-New England #2 Greg Campoli New York ISO #2	x		
Peter Burke ATC #1	x		
Gerald Rheault Manitoba Hydro #1, 3, 5, 6	x		
<u>FRCC Op, Eng &amp; Mkt Int</u> Linda Campbell FRCC #2 Paul Elwing Lakeland Electric # 3 John Shaffer FPL #1 Bob Remley Clay Elec Coop #4 Patti Metro FRCC #2 Eirc Grant Progress Energy – FL #1 Joe Roos Ocala Electric Utility #3 Joe Krupar FL Muni Pwr Agency #3 Richard Gilbert Lakeland Electric #3 Bill Slater Progress Energy – FL #1 Amy Long Lakeland Electric #1 Roger Westphal Gainesville Regional Util #5 Bob Goss SEPA #5	x		

**Draft Comments and Considerations for 2<sup>nd</sup> Posting for Operate Within IROLs Standard Requirement 205 – Data Specification**

Steve Wallace Seminore Electric Coop #4 Ted Hobson JEA #1			
Alan Boesch NPPD #1	x		
Raymond Mammarella PPL Elec Util #1	x		
Tom Pruitt Duke Power #1	x		
Tony Jankowski We Energies #4	x		
Michael Sidiropoulos Pacificorp	x		
Robert Grover PPL Elec Util #3	x		
MAAP Ops Subcommittee #2 Llyod Linke MAPP Allan Silk Manitoba Hydro Paul Brune NPPD Tod Gosnell Omaha Public Pwr Dist Paul Koskela Minnesota Pwr Larry Larson Otter Tail Power Derrick Moe WAPA Dick Pursley Great River Energy Martin Trencce Xcel Energy Joseph Knight MAPPCOR	x		
John Horakh MAAC #2	x		
BPA Adm TBL #1 James Murphy Mike Viles James Randall Al Johnson Jeff Newby Jim Gronquist Sylvia Wiggerhaus Brian Tuck Dick Spence Tracy Rolstad Steve Hitchens	x		
Darrell Richardson Illinois Power #1, 3	x		
David Thorne Pepco #1	x		
<u>SERC Operations Planning Subcommittee</u> Carter Edge SEPA #4, 5 William Gaither So Carolina Pub Serv Auth #1 Mike Miller Southern Co #1	x		

**Draft Comments and Considerations for 2<sup>nd</sup> Posting for Operate Within IROLs Standard Requirement 205 – Data Specification**

Roger Brand Muni Elec Auth GA #1 Phil Creech Progress Energy – CP&L #1 Gene Delk So Carolina Elec & Gas #1 Al McMeekin So Carolina Elec & Gas #1 Greg Ott Alcoa-Yadkin #1 Doug Newbaue GA System Operations #1 Mike Clements TVA #1 Don Reichenbach Duke Energy #1 Lynna Estep SERC #2 Mark Creech TVA #1			
Albert DiCaprio MAAC #2	x		
Alan Johnson Mirant Americas Energy Mktg #6	x		
Mark Heimbach PPL Generation #6	x		
<u>Centerpoint Energy #1</u> Richard Sikes John Jonte Wayne Kemper Glenn Hemperley Brad Calhoun	x		
Charles Yeung Reliant #5		x	
Susan Morris SERC #2 Bill Reinke SERC #2 Sam Stryker Fayettevill PWC #3, 4, 5 Carter Edge SEPA #4, 5 Bill Thompson Dominion Trans #1		x	
Ed Davis Entergy Services #1		x	
<u>Trans Subcommittee</u> Robert E. Reed PJM Daniel Cooper Michigan Public Power Agency Ken Donohoo ERCOT Michael Gildea Duke-Energy, North America Francis Halpin Bonneville Power Administration Tom Mallinger Midwest ISO Darrick Moe Western Area Power Adm		x	

**Draft Comments and Considerations for 2<sup>nd</sup> Posting for Operate Within IROLs Standard Requirement 205 – Data Specification**

Scott Moore American Electric Power Bill Slater Florida Power Corporation Tom Stuchlik Western Resources Joseph Styslinger Southern Company David Thorne D. H. Thorne Consultants, Inc Robert Waldele New York ISO Roman Carter Southern Company John Ahr Alleghany Power Systems Susan Morris SERC Ed Pfeiffer Ameren Ray Palmieri ECAR Tom Vandervort NERC			
<u>Southern Company Generation &amp; Energy Mktg</u> Roman Carter # 5, 6 Joel Dison #5,6 Tony Reed #5,6 Lucius Burris #5,6 David Deerman #5,6 Clifford Shepard #5,6 Michael Smith #5,6 Lloyd Barnes SCGEM 5,6 Gary Miller SCGEM 5,6 Terry Crawley Southern Generation 5 Roger Green Southern Generation 5		x	
<u>Southern Co Transmission Planning #1</u> Todd Lucas Southern Co Joe Payne Mississippi Power Company Travis Koval Southern Co Bill Pope Gulf Power Company John Clark Southern Co David Johnson Savannah Electric Mike Miller Southern Co Jim Griffith Southern Co Monroe Landrum Southern Co		x	
Dan Boezio & Raj Rana AEP #1, 3, 5, 6		x	

**Draft Comments and Considerations for 2<sup>nd</sup> Posting for Operate Within IROLs Standard Requirement 205 – Data Specification**

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<u>Operating Reliability Working Group SPP</u> Gerry Burrows KCP&L #1 Bob Cochran SPS #1 Peter Kuebeck OG&E #1 Scott Moore AEP #1 Tom Stuchlik Westar #1 Dan Boezio AEP #1 Matt Bordelon CLECO #1 Mike Crouch WFEC #1 Mike Gammon KCP&L #1 Kevin Goolsby SPP #2 Bo Jones Westar #1 Allen Klassen Westar #1 Thad Ness AEP #1 Harold Wyble KCP&L #1 Robert Rhodes SPP #2		x	
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**Draft Comments and Considerations for 2<sup>nd</sup> Posting for Operate Within IROLs Standard Requirement 205 – Data Specification**

**Requirement 205 - Data Specification - Do you agree with the measures?**

Commenter	Yes	No	Comments
Kathleen Goodman ISO-NE #2	x		
Ken Githens Allegheny Energy Supply #5	x		
William Smith Allegheny Power #1	x		
Stuart Goza TVA #1	x		
<u>NPCC CP9</u> Michael Schiavone National Grid USA #1 Roger Champagne Hydro-Quebec TransEnergie #1 Ralph Rufrano New York Power Authority #1 David Little Nova Scotia Power Inc. #1 David Kiguel Hydro One Networks #1 Michael Potishnak ISO-New England #2 Barry Gee National Grid USA #1 Dan Stosick ISO-New England #2 Fernando Saavedra ISO-New England #2 Greg Campoli New York ISO #2	x		
<u>Southern Co Transmission Planning #1</u> Todd Lucas Southern Co Joe Payne Mississippi Power Company Travis Koval Southern Co Bill Pope Gulf Power Company John Clark Southern Co David Johnson Savannah Electric Mike Miller Southern Co Jim Griffith Southern Co Monroe Landrum Southern Co	x		
Peter Burke ATC #1	x		
Gerald Rheault Manitoba Hydro #1, 3, 5, 6	x		
<u>FRCC Op, Eng &amp; Mkt Int</u> Linda Campbell FRCC #2 Paul Elwing Lakeland Electric # 3 John Shaffer FPL #1 Bob Remley Clay Elec Coop #4 Patti Metro FRCC #2	x		

**Draft Comments and Considerations for 2<sup>nd</sup> Posting for Operate Within IROLs Standard Requirement 205 – Data Specification**

Eirc Grant Progress Energy – FL #1 Joe Roos Ocala Electric Utility #3 Joe Krupar FL Muni Pwr Agency #3 Richard Gilbert Lakeland Electric #3 Bill Slater Progress Energy – FL #1 Amy Long Lakeland Electric #1 Roger Westphal Gainesville Regional Util #5 Bob Goss SEPA #5 Steve Wallace Seminore Electric Coop #4 Ted Hobson JEA #1			
Alan Boesch NPPD #1	x		
Raymond Mammarella PPL Elec Util #1	x		
Tom Pruitt Duke Power #1	x		
Tony Jankowski We Energies #4	x		
Michael Sidiropoulos Pacificorp	x		
Robert Grover PPL Elec Util #3	x		
MAAP Ops Subcommittee #2 Llyod Linke MAPP Allan Silk Manitoba Hydro Paul Brune NPPD Tod Gosnell Omaha Public Pwr Dist Paul Koskela Minnesota Pwr Larry Larson Otter Tail Power Derrick Moe WAPA Dick Pursley Great River Energy Martin Trencce Xcel Energy Joseph Knight MAPPCOR	x		
John Horakh MAAC #2	x		
BPA Adm TBL #1 James Murphy Mike Viles James Randall Al Johnson Jeff Newby Jim Gronquist Sylvia Wiggerhaus Brian Tuck Dick Spence Tracy Rolstad	x		



**Draft Comments and Considerations for 2<sup>nd</sup> Posting for Operate Within IROLs Standard Requirement 205 – Data Specification**

Steve Hitchens			
Darrell Richardson Illinois Power #1, 3	x		
David Thorne Pepco #1	x		
Albert DiCaprio MAAC #2	x		
Alan Johnson Mirant Americas Energy Mktg #6	x		
Mark Heimbach PPL Generation #6	x		
<u>Centerpoint Energy #1</u> Richard Sikes John Jonte Wayne Kemper Glenn Hemperley Brad Calhoun	x		
<u>Trans Subcommittee</u> Robert E. Reed PJM Daniel Cooper Michigan Public Power Agency Ken Donohoo ERCOT Michael Gildea Duke-Energy, North America Francis Halpin Bonneville Power Administration Tom Mallinger Midwest ISO Darrick Moe Western Area Power Adm Scott Moore American Electric Power Bill Slater Florida Power Corporation Tom Stuchlik Western Resources Joseph Styslinger Southern Company David Thorne D. H. Thorne Consultants, Inc Robert Waldele New York ISO Roman Carter Southern Company John Ahr Alleghany Power Systems Susan Morris SERC Ed Pfeiffer Ameren Ray Palmieri ECAR Tom Vandervort NERC	x		

**Draft Comments and Considerations for 2<sup>nd</sup> Posting for Operate Within IROLs Standard Requirement 205 – Data Specification**

<u>Southern Company Generation &amp; Energy Mktg</u> Roman Carter # 5, 6 Joel Dison #5,6 Tony Reed #5,6 Lucius Burris #5,6 David Deerman #5,6 Clifford Shepard #5,6 Michael Smith #5,6 Lloyd Barnes SCGEM 5,6 Gary Miller SCGEM 5,6 Terry Crawley Southern Generation 5 Roger Green Southern Generation 5	x		
Terry Bilke Midwest ISO #2		x	
Charles Yeung Reliant #5		x	
Susan Morris SERC #2 Bill Reinke SERC #2 Sam Stryker Fayettevill PWC #3, 4, 5 Carter Edge SEPA #4, 5 Bill Thompson Dominion Trans #1		x	
Ed Davis Entergy Services #1		x	
<u>SERC Operations Planning Subcommittee</u> Carter Edge SEPA #4, 5 William Gaither So Carolina Pub Serv Auth #1 Mike Miller Southern Co #1 Roger Brand Muni Elec Auth GA #1 Phil Creech Progress Energy – CP&L #1 Gene Delk So Carolina Elec & Gas #1 Al McMeekin So Carolina Elec & Gas #1 Greg Ott Alcoa-Yadkin #1 Doug Newbaue GA System Operations #1 Mike Clements TVA #1 Don Reichenbach Duke Energy #1 Lynna Estep SERC #2 Mark Creech TVA #1		x	

**Draft Comments and Considerations for 2<sup>nd</sup> Posting for Operate Within IROLs Standard Requirement 205 – Data Specification**

Dan Boezio & Raj Rana AEP #1, 3, 5, 6		x	
<u>Operating Reliability Working Group SPP</u>		x	
Gerry Burrows KCP&L #1			
Bob Cochran SPS #1			
Peter Kuebeck OG&E #1			
Scott Moore AEP #1			
Tom Stuchlik Westar #1			
Dan Boezio AEP #1			
Matt Bordelon CLECO #1			
Mike Crouch WFEC #1			
Mike Gammon KCP&L #1			
Kevin Goolsby SPP #2			
Bo Jones Westar #1			
Allen Klassen Westar #1			
Thad Ness AEP #1			
Harold Wyble KCP&L #1			
Robert Rhodes SPP #2			

**Draft Comments and Considerations for 2<sup>nd</sup> Posting for Operate Within IROLs Standard Requirement 205 – Data Specification**

**Requirement 205 - Data Specification - Do you agree with the compliance monitoring process?**

Commenter	Yes	No	Comments
Kathleen Goodman ISO-NE #2	x		
Terry Bilke Midwest ISO #2	x		
Ken Githens Allegheny Energy Supply #5	x		
William Smith Allegheny Power #1	x		
<u>NPCC CP9</u> Michael Schiavone National Grid USA #1 Roger Champagne Hydro-Quebec TransEnergie #1 Ralph Rufrano New York Power Authority #1 David Little Nova Scotia Power Inc. #1 David Kiguel Hydro One Networks #1 Michael Potishnak ISO-New England #2 Barry Gee National Grid USA #1 Dan Stosick ISO-New England #2 Fernando Saavedra ISO-New England #2 Greg Campoli New York ISO #2	x		
<u>Southern Co Transmission Planning #1</u> Todd Lucas Southern Co Joe Payne Mississippi Power Company Travis Koval Southern Co Bill Pope Gulf Power Company John Clark Southern Co David Johnson Savannah Electric Mike Miller Southern Co Jim Griffith Southern Co Monroe Landrum Southern Co	x		
Peter Burke ATC #1	x		
Gerald Rheault Manitoba Hydro #1, 3, 5, 6	x		
<u>FRCC Op, Eng &amp; Mkt Int</u> Linda Campbell FRCC #2 Paul Elwing Lakeland Electric # 3 John Shaffer FPL #1 Bob Remley Clay Elec Coop #4 Patti Metro FRCC #2	x		

**Draft Comments and Considerations for 2<sup>nd</sup> Posting for Operate Within IROLs Standard Requirement 205 – Data Specification**

Eirc Grant Progress Energy – FL #1 Joe Roos Ocala Electric Utility #3 Joe Krupar FL Muni Pwr Agency #3 Richard Gilbert Lakeland Electric #3 Bill Slater Progress Energy – FL #1 Amy Long Lakeland Electric #1 Roger Westphal Gainesville Regional Util #5 Bob Goss SEPA #5 Steve Wallace Seminore Electric Coop #4 Ted Hobson JEA #1			
Alan Boesch NPPD #1	x		
Dan Boezio & Raj Rana AEP #1, 3, 5, 6	x		
Raymond Mammarella PPL Elec Util #1	x		
Tom Pruitt Duke Power #1	x		
Tony Jankowski We Energies #4	x		
Michael Sidiropoulos Pacificorp	x		
Robert Grover PPL Elec Util #3	x		
MAAP Ops Subcommittee #2 Llyod Linke MAPP Allan Silk Manitoba Hydro Paul Brune NPPD Tod Gosnell Omaha Public Pwr Dist Paul Koskela Minnesota Pwr Larry Larson Otter Tail Power Derrick Moe WAPA Dick Pursley Great River Energy Martin Trencce Xcel Energy Joseph Knight MAPPCOR	x		
John Horakh MAAC #2	x		
BPA Adm TBL #1 James Murphy Mike Viles James Randall Al Johnson Jeff Newby Jim Gronquist	x		

**Draft Comments and Considerations for 2<sup>nd</sup> Posting for Operate Within IROLs Standard Requirement 205 – Data Specification**

Sylvia Wiggerhaus Dick Spence Steve Hitchens	Brian Tuck Tracy Rolstad			
Darrell Richardson	Illinois Power #1, 3	x		
David Thorne	Pepco #1	x		
Albert DiCaprio	MAAC #2	x		
Alan Johnson	Mirant Americas Energy Mktg #6	x		
Mark Heimbach	PPL Generation #6	x		
<u>Centerpoint Energy #1</u> Richard Sikes John Jonte Wayne Kemper Glenn Hemperley Brad Calhoun		x		
<u>Trans Subcommittee</u> Robert E. Reed Daniel Cooper Ken Donohoo Michael Gildea Francis Halpin Tom Mallinger Darrick Moe Scott Moore Bill Slater Tom Stuchlik Joseph Styslinger David Thorne Robert Waldele Roman Carter John Ahr Susan Morris Ed Pfeiffer Ray Palmieri Tom Vandervort	PJM Michigan Public Power Agency ERCOT Duke-Energy, North America Bonneville Power Administration Midwest ISO Western Area Power Adm American Electric Power Florida Power Corporation Western Resources Southern Company D. H. Thorne Consultants, Inc New York ISO Southern Company Alleghany Power Systems SERC Ameren ECAR NERC	x		

**Draft Comments and Considerations for 2<sup>nd</sup> Posting for Operate Within IROLs Standard Requirement 205 – Data Specification**

<p><u>Southern Company Generation &amp; Energy Mktg</u>          Roman Carter # 5, 6          Joel Dison #5,6          Tony Reed #5,6          Lucius Burris #5,6          David Deerman #5,6          Clifford Shepard #5,6          Michael Smith #5,6          Lloyd Barnes SCGEM 5,6          Gary Miller SCGEM 5,6          Terry Crawley Southern Generation 5          Roger Green Southern Generation 5</p>	<p>x</p>		
<p><u>Compliance Subcommittee</u></p>			<p>Change 4.1 to: The responsible entity shall demonstrate compliance to the compliance monitor within the first year that this standard becomes effective or the first year the entity commences operation by information submittal to the compliance monitor, either on or off site at the compliance monitors discretion.          Add new 4.2 Subsequent to the initial compliance review, compliance will be re-verified at least every three years using a scheduled on-site review method or un-scheduled (investigation) method, review of information submitted as requested, or through self-certification, at the discretion of the compliance monitor.          Re-number 4.2 and 4.3 to 4.3 and 4.4</p>
<p>The suggested language changes were not adopted for the following reasons:</p> <ul style="list-style-type: none"> <li>- "Information submittal" is an undefined term. Industry commenters have asked that the compliance elements be as specific as possible so that there won't be huge variations from region to region in the application of the compliance monitoring. If an 'information submittal' is the same as a self-certification document, then this is already covered in the original language. Including language that gives each compliance monitor the flexibility to assess this requirement however it chooses, does not conform with the industry's requests for standardization in the compliance monitoring process.</li> </ul> <p>The only significant change between the original language and the proposed new section 4.2 is the addition of the concept that the compliance monitor has the freedom to either conduct an audit per a schedule, or just show up unscheduled. Again, this does not support the industry's request for increased standardization in the compliance monitoring process. The original language included the option of conducting an 'investigation upon compliant' and this seems more appropriate than unscheduled audits.</p>			
<p>Stuart Goza TVA #1</p>		<p>x</p>	

**Draft Comments and Considerations for 2<sup>nd</sup> Posting for Operate Within IROLs Standard Requirement 205 – Data Specification**

<p><u>Operating Reliability Working Group SPP</u>                  Gerry Burrows KCP&amp;L #1                  Bob Cochran SPS #1                  Peter Kuebeck OG&amp;E #1                  Scott Moore AEP #1                  Tom Stuchlik Westar #1                  Dan Boezio AEP #1                  Matt Bordelon CLECO #1                  Mike Crouch WFEC #1                  Mike Gammon KCP&amp;L #1                  Kevin Goolsby SPP #2                  Bo Jones Westar #1                  Allen Klassen Westar #1                  Thad Ness AEP #1                  Harold Wyble KCP&amp;L #1                  Robert Rhodes SPP #2</p>		x	
<p>Charles Yeung Reliant #5</p>		x	
<p>Susan Morris SERC #2                  Bill Reinke SERC #2                  Sam Stryker Fayettevill PWC #3, 4, 5                  Carter Edge SEPA #4, 5                  Bill Thompson Dominion Trans #1</p>		x	
<p>Ed Davis Entergy Services #1</p>		x	
<p><u>SERC Operations Planning Subcommittee</u>                  Carter Edge SEPA #4, 5                  William Gaither So Carolina Pub Serv Auth #1                  Mike Miller Southern Co #1                  Roger Brand Muni Elec Auth GA #1                  Phil Creech Progress Energy – CP&amp;L #1                  Gene Delk So Carolina Elec &amp; Gas #1                  Al McMeekin So Carolina Elec &amp; Gas #1                  Greg Ott Alcoa-Yadkin #1                  Doug Newbaue GA System Operations #1                  Mike Clements TVA #1</p>		x	



**Draft Comments and Considerations for 2<sup>nd</sup> Posting for Operate Within IROLs Standard  
Requirement 205 – Data Specification**

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Don Reichenbach Duke Energy #1 Lynna Estep SERC #2 Mark Creech TVA #1			
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**Draft Comments and Considerations for 2<sup>nd</sup> Posting for Operate Within IROLs Standard Requirement 205 – Data Specification**

**Requirement 205 - Data Specification - Do you agree with the levels of non-compliance?**

Commenter	Yes	No	Comments
Kathleen Goodman ISO-NE #2	x		
Terry Bilke Midwest ISO #2	x		
Ken Githens Allegheny Energy Supply #5	x		
William Smith Allegheny Power #1	x		
Stuart Goza TVA #1	x		
<u>NPCC CP9</u> Michael Schiavone National Grid USA #1 Roger Champagne Hydro-Quebec TransEnergie #1 Ralph Rufrano New York Power Authority #1 David Little Nova Scotia Power Inc. #1 David Kiguel Hydro One Networks #1 Michael Potishnak ISO-New England #2 Barry Gee National Grid USA #1 Dan Stosick ISO-New England #2 Fernando Saavedra ISO-New England #2 Greg Campoli New York ISO #2	x		
<u>Southern Co Transmission Planning #1</u> Todd Lucas Southern Co Joe Payne Mississippi Power Company Travis Koval Southern Co Bill Pope Gulf Power Company John Clark Southern Co David Johnson Savannah Electric Mike Miller Southern Co Jim Griffith Southern Co Monroe Landrum Southern Co	x		
Peter Burke ATC #1	x		
Susan Morris SERC #2 Bill Reinke SERC #2 Sam Stryker Fayettevill PWC #3, 4, 5 Carter Edge SEPA #4, 5 Bill Thompson Dominion Trans #1	x		
Gerald Rheault Manitoba Hydro #1, 3, 5, 6	x		

**Draft Comments and Considerations for 2<sup>nd</sup> Posting for Operate Within IROLs Standard Requirement 205 – Data Specification**

Alan Boesch NPPD #1	x		
Dan Boezio & Raj Rana AEP #1, 3, 5, 6	x		
Raymond Mammarella PPL Elec Util #1	x		
Tom Pruitt Duke Power #1	x		
Tony Jankowski We Energies #4	x		
Michael Sidiropoulos Pacificorp	x		
Robert Grover PPL Elec Util #3	x		
Southern Co Transmission Planning Todd Lucas Southern Co #1 Joe Payne Mississippi Pwr Co #3 Travis Koval Southern Co #1 Bill Pope Gulf Pwr Co #3 John Clark Southern Co #1 David Johnson Savannah Electric #3	x		
MAAP Ops Subcommittee #2 Llyod Linke MAPP Allan Silk Manitoba Hydro Paul Brune NPPD Tod Gosnell Omaha Public Pwr Dist Paul Koskela Minnesota Pwr Larry Larson Otter Tail Power Derrick Moe WAPA Dick Pursley Great River Energy Martin Trencle Xcel Energy Joseph Knight MAPPCOR	x		
John Horakh MAAC #2	x		
BPA Adm TBL #1 James Murphy Mike Viles James Randall Al Johnson Jeff Newby Jim Gronquist Sylvia Wiggerhaus Brian Tuck Dick Spence Tracy Rolstad Steve Hitchens	x		

**Draft Comments and Considerations for 2<sup>nd</sup> Posting for Operate Within IROLs Standard Requirement 205 – Data Specification**

Darrell Richardson Illinois Power #1, 3	x		
David Thorne Pepco #1	x		
<u>SERC Operations Planning Subcommittee</u> Carter Edge SEPA #4, 5 William Gaither So Carolina Pub Serv Auth #1 Mike Miller Southern Co #1 Roger Brand Muni Elec Auth GA #1 Phil Creech Progress Energy – CP&L #1 Gene Delk So Carolina Elec & Gas #1 Al McMeekin So Carolina Elec & Gas #1 Greg Ott Alcoa-Yadkin #1 Doug Newbaue GA System Operations #1 Mike Clements TVA #1 Don Reichenbach Duke Energy #1 Lynna Estep SERC #2 Mark Creech TVA #1	x		
Albert DiCaprio MAAC #2	x		
Alan Johnson Mirant Americas Energy Mktg #6	x		
Mark Heimbach PPL Generation #6	x		
<u>Centerpoint Energy #1</u> Richard Sikes John Jonte Wayne Kemper Glenn Hemperley Brad Calhoun	x		

**Draft Comments and Considerations for 2<sup>nd</sup> Posting for Operate Within IROLs Standard Requirement 205 – Data Specification**

<u>Southern Company Generation &amp; Energy Mktg</u> Roman Carter # 5, 6 Joel Dison #5,6 Tony Reed #5,6 Lucius Burris #5,6 David Deerman #5,6 Clifford Shepard #5,6 Michael Smith #5,6 Lloyd Barnes SCGEM 5,6 Gary Miller SCGEM 5,6 Terry Crawley Southern Generation 5 Roger Green Southern Generation 5	x		
Charles Yeung Reliant #5		x	
<u>FRCC Op, Eng &amp; Mkt Int</u> Linda Campbell FRCC #2 Paul Elwing Lakeland Electric # 3 John Shaffer FPL #1 Bob Remley Clay Elec Coop #4 Patti Metro FRCC #2 Eirc Grant Progress Energy – FL #1 Joe Roos Ocala Electric Utility #3 Joe Krupar FL Muni Pwr Agency #3 Richard Gilbert Lakeland Electric #3 Bill Slater Progress Energy – FL #1 Amy Long Lakeland Electric #1 Roger Westphal Gainesville Regional Util #5 Bob Goss SEPA #5 Steve Wallace Seminore Electric Coop #4 Ted Hobson JEA #1		x	

**Draft Comments and Considerations for 2<sup>nd</sup> Posting for Operate Within IROLs Standard Requirement 205 – Data Specification**

<u>Operating Reliability Working Group SPP</u> Gerry Burrows KCP&L #1 Bob Cochran SPS #1 Peter Kuebeck OG&E #1 Scott Moore AEP #1 Tom Stuchlik Westar #1 Dan Boezio AEP #1 Matt Bordelon CLECO #1 Mike Crouch WFEC #1 Mike Gammon KCP&L #1 Kevin Goolsby SPP #2 Bo Jones Westar #1 Allen Klassen Westar #1 Thad Ness AEP #1 Harold Wyble KCP&L #1 Robert Rhodes SPP #2		x	
Ed Davis Entergy Services #1		x	

**Draft Comments and Considerations for 2<sup>nd</sup> Posting for Operate Within IROLs Standard Requirement 205 – Data Specification**

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**Requirement 205 - Data Specification –Other comments**

**Summary Consideration:**

The BA and LSE were added to the list of functions the RA may send a data specification because the entities performing these functions may have data the RA needs to support real-time monitoring, operational planning analyses and real-time assessments conducted relative to operating within its reliability area’s IROLs.

Additional language was added to clarify that the RA shall report incidents of not receiving data as specified if the RA has been unable to resolve the issue. This should provide entities an opportunity to resolve issues without involving sanctions.

The compliance monitoring process was modified to change the performance reset period to ‘12 months from the last violation’

The SDT was unable to accommodate the changes recommending that the Transmission Owner and Transmission Operator be added to this requirement. The Functional Model assigns responsibility for monitoring operating reliability limits and for conducting operating reliability analyses to the Reliability Authority and these new standards must be written in a manner that supports the delineation of responsibility outlined in the Functional Model. The data being addressed in this requirement is data needed to support real time monitoring and operational planning analyses and real-time assessments relative to IROLs. The Transmission Operator is responsible for local network integrity, not the reliability of the bulk transmission system and does not need the data for this standard.

Commenter	Comments
Ken Githens Allegheny Energy Supply #5	<p><i>However, refer to comment under question 37.</i></p> <p>(RA data collection and communication is required under Std. 200 and 600 with financial sanction for noncompliance under both. An organization should not be hit with financial sanctions under both standards for not communicating the data. Only one standard should apply.)</p>
<p>The Determine Facility Ratings, System Operating Limits and Transfer Capabilities standard does require that equipment owners provide facility ratings data to the RA for the development of System Operating Limits. If the same data is needed by the RA for both standards, then it is up to the compliance manager to determine the appropriate sanction. We sent a suggestion to the Director, Compliance, recommending that the Compliance Enforcement Program develop a formal way of addressing situations such as this, but preventing this from happening is beyond the scope of the SDT.</p>	

**Draft Comments and Considerations for 2<sup>nd</sup> Posting for Operate Within IROLs Standard Requirement 205 – Data Specification**

<p>Terry Bilke Midwest ISO #2</p>	<p>Why does the RA have to notify the Compliance Monitor within 5 days if an entity doesn't provide data to the RA if 'data provision' is monitored via annual self-certification?</p> <p>The standard requires the RA to be responsible for collecting data from all participants in a 'mutually agreeable' format. This seems to be saying that each generator owner, BA, TP can ask for a different format. If the RA doesn't agree to this, the RA becomes non-compliant because it is failing to collect data.</p> <p>The RA should have the authority to require consistent data formats from each participant group (the participant group as a whole should have a say in the data format, not each individual participant).</p>
<p>By requesting that the RA notify the Compliance Monitor if data is not provided, the RA is providing the Compliance Monitor with the justification for conducting an 'investigation upon complaint'. The Compliance Monitor would then conduct an 'investigation upon complaint' (under Requirement 206). If the RA doesn't notify the Compliance Monitor and let the Compliance Monitor know that data isn't being provided, then the Compliance Monitor doesn't have justification to conduct an investigation to determine why the data isn't being provided. Note that this requirement was modified to give the RA an opportunity to resolve the issue first, and only notify the Compliance Monitor when the RA is unable to resolve the issue of not being provided the data as specified.</p> <p>Requiring consistent data formats for each participant group seems outside the scope of this standard, but there is nothing to preclude an RA from attempting to use this technique to reach consensus on agreeable formats.</p>	
<p>Stuart Goza TVA #1</p>	<p>Generally, the Measures should be tied to the Requirements and the Objective Evidence for Compliance (OEC) should be tied to the Measures.</p> <p>Section 4.3 should be rewritten to read:</p> <p style="padding-left: 40px;">4.3. The reliability authority shall have the following available upon the request of the compliance monitor:</p> <p style="padding-left: 80px;">4.3.1. Data specification(s) <b>in accordance with Measure 2.1</b></p> <p style="padding-left: 80px;">4.3.2. Proof of distribution of the data specification(s) <b>in accordance with Measure 2.2</b></p>
<p>The suggested format change was not adopted. The standards have been drafted to be as succinct as possible – and the additional words do not add anything to the standard. In addition, when the standards are completed, they will be available to the industry in a relational database with search capabilities. If the suggested cross-referencing were adopted, and someone downloaded a report that listed just the compliance elements for this standard, the cross references would lead the reader to believe that additional information could be found in the measures – and in many cases this is not true.</p>	
<p>Southern Co Transmission Planning #1</p>	<p>The Transmission Operator should also be included in this requirement for "the areas</p>



**Draft Comments and Considerations for 2<sup>nd</sup> Posting for Operate Within IROLs Standard Requirement 205 – Data Specification**

<p>Todd Lucas Southern Co          Joe Payne Mississippi Power Company          Travis Koval Southern Co          Bill Pope Gulf Power Company          John Clark Southern Co          David Johnson Savannah Electric          Mike Miller Southern Co          Jim Griffith Southern Co          Monroe Landrum Southern Co</p>	<p>for which they are responsible".</p>
<p>The Functional Model assigns responsibility for monitoring operating reliability limits and for conducting operating reliability analyses to the Reliability Authority and these new standards must be written in a manner that supports the delineation of responsibility outlined in the Functional Model. The data being addressed in this requirement is data needed to support real time monitoring and operational planning analyses and real-time assessments relative to IROLs. The Transmission Operator is responsible for local network integrity, not the reliability of the bulk transmission system and does not need the data for this standard.</p>	
<p>Charles Yeung Reliant #5</p>	<p>The data obtained through this reliability requirement have significant commercial significance. NERC must ensure that the entities who receive such information have their employees maintain confidentiality of the data from market participants including their affiliated generators, transmission providers, load serving entities, marketers or other relevant market participants. Although a confidentiality agreement or confidentiality requirement is not a specific reliability need, NERC must be cognizant of and sympathetic to these commercial concerns in its reliability requirements. The confidentiality agreement itself may be developed and administered through some other standard setting organization.</p>
<p>The requirement limits the data to that which is needed for real time monitoring and for analyses and assessments relative to IROLs. This standard does not address sharing of data collected by the RA.          The RA Certification SAR includes the following requirements:</p> <ul style="list-style-type: none"> <li>- Documentation identifying that the organization has signed the NERC Confidentiality Agreement.</li> <li>- Documentation identifying that the Reliability Authority personnel are aware of their obligations and responsibilities under the NERC Confidentiality Agreement.</li> <li>- Documentation identifying the code of conduct for personnel performing the Reliability Authority responsibilities.</li> <li>- Documentation identifying that the Reliability Authority personnel are aware of their obligations and responsibilities under the code of conduct.</li> </ul>	
<p>FRCC Op. Eng &amp; Mkt Int          Linda Campbell FRCC #2          Paul Elwing Lakeland Electric # 3          John Shaffer FPL #1          Bob Remley Clay Elec Coop #4</p>	<p>Is requirement 1.1.3 really meant to be RA's other than themselves? Again, confusion about who/what the RA really is. Depending on who/what is the RA, we may have concern over what data is being requested. There needs to be a reliability justification for the data requested. What happens if there is a disagreement over what data should be supplied? In regards to the levels of non-compliance, why only levels 1 and 2 in this requirement and level 4 in all the others? Does this imply that this standard is not as</p>

**Draft Comments and Considerations for 2<sup>nd</sup> Posting for Operate Within IROLs Standard Requirement 205 – Data Specification**

<p>Patti Metro FRCC #2          Eirc Grant Progress Energy – FL #1          Joe Roos Ocala Electric Utility #3          Joe Krupar FL Muni Pwr Agency #3          Richard Gilbert Lakeland Electric #3          Bill Slater Progress Energy – FL #1          Amy Long Lakeland Electric #1          Roger Westphal Gainesville Regional Util #5          Bob Goss SEPA #5          Steve Wallace Seminore Electric Coop #4          Ted Hobson JEA #1</p>	<p>important?</p>
<p>RA's monitor parts of other RA's systems and will need to collect and share data with one another. The reliability authority is defined in the functional model.</p> <p>The reliability justification for the data being specified is addressed in the requirement. The data is limited to that which is needed for real-time monitoring, operational planning analyses and real-time assessments relative to IROLs.</p> <p>Regions do have a dispute resolution process, and so does NERC. This can be used by any entity to clarify such matters, and doesn't need to be specifically addressed in each standard.</p> <p>Exceeding an IROL for time greater than the IROL's <math>T_v</math> does seem to be a more important measure than having a complete data specification.</p>	

**Draft Comments and Considerations for 2<sup>nd</sup> Posting for Operate Within IROLs Standard Requirement 205 – Data Specification**

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<p>Dan Boezio &amp; Raj Rana AEP #1, 3, 5, 6</p>	<ol style="list-style-type: none"><li>1. Defined terms should be capitalized, such as “Reliability Authority”, “Operational Planning Analyses”, “Interconnected Reliability Operating Limits”, etc</li><li>2. This section should only deal with the data specification. The data collection portion should either be its own section or be combined with section 206 at a minimum. Items 1.3 and 2.3 of this section should be a part of that new section or merged into section 206.</li><li>3. The standard as it is written assumes that 100 percent of the data that is required for real-time monitoring, operational planning analyses and real-time assessments can be collected 100 percent of the time. The availability of real-time data is subject to many controllable and uncontrollable factors of both the Reliability Authority and the entity providing the data.</li><li>4. The Reliability Authority and the entity providing the data should have documented protocols for the acceptable level of data quality and availability specific to the data type, need, and other factors. This information is outside the scope of this standard, but this standard should ensure that the documentation does exist and the requirements established in the protocols are enforced. This will enable the requirement of the entity to provide the data sufficient for the Reliability Authority to perform its functions and require the Reliability Authority to report any non-compliance without the ambiguity of what is an acceptable failure or not.</li><li>5. What is the dispute resolution process for disagreements with requirements established by the Reliability Authority? Can the entity say they cannot provide the data requested and justify why not to some group or entity? We suggest that there should be a provision that the data requested by the RA is reasonable and needed and that the NERC Regional Reliability Councils will be the arbiter for disputes.</li><li>6. We continue to maintain that there needs to be an industry minimum specification for the type of data required, similar to Appendix 4B “Electric System Security Data.”</li><li>7. There should be a requirement that the data specification, including scan rates, data transmission rates, and data quality, is mutually agreed upon between the RA and their data supplier.</li></ol>
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**Draft Comments and Considerations for 2<sup>nd</sup> Posting for Operate Within IROLs Standard Requirement 205 – Data Specification**

1. The suggested change, that defined terms be capitalized, has been adopted and is reflected in the revised standard.
2. There is nothing in the standards development process that requires the type of separation of requirements suggested. During the initial posting of this Standard, the industry indicated a preference for grouping related requirements, and the SDT has tried to meet this directive.
3. The data specification needs to address actions to provide data when automated data collection systems are not operational. There should not be a sanction if this process is followed to provide the RA with data upon the loss of an automated system.
4. Including data quality protocols goes beyond the scope of the standard.
5. Regions do have a dispute resolution process, and so does NERC. This can be used by any entity to clarify such matters, and doesn't need to be specifically addressed in each standard.
6. The industry as a whole is not in favor of a 'minimum' set of data. Any RA is free to copy the contents of Appendix 4B and include this as part of its data specification. Appendix 4B, by itself, would not meet all of the measures in this requirement.
7. The standard does require that data be provided in a 'mutually agreed upon format'. This was intended to protect the interests of the RA and the entities that must provide the RA with data. The data specification is not limited to the elements that are listed in the standard. The RA may add more elements to the data specification, but these additional elements will not be reviewed for compliance.

Operating Reliability Working Group SPP  
 Gerry Burrows KCP&L #1  
 Bob Cochran SPS #1  
 Peter Kuebeck OG&E #1  
 Scott Moore AEP #1  
 Tom Stuchlik Westar #1  
 Dan Boezio AEP #1  
 Matt Bordelon CLECO #1  
 Mike Crouch WFECC #1  
 Mike Gammon KCP&L #1  
 Kevin Goolsby SPP #2  
 Bo Jones Westar #1  
 Allen Klassen Westar #1  
 Thad Ness AEP #1  
 Harold Wyble KCP&L #1  
 Robert Rhodes SPP #2

Requirements 1.1, 1.2 and 1.3 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 SDT should define a minimum, default set of data, such as that spelled out in Appendix 4B, and provide that as a guide for what type of data may be requested.

Requirement 1.3 appears to be repeated again as a measure in Measure 2.3. Shouldn't Requirement 1.3 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.

The performance reset period should be changed to 12 months rather than one calendar year.

## Draft Comments and Considerations for 2<sup>nd</sup> Posting for Operate Within IROLs Standard Requirement 205 – Data Specification

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1. Adding a justification requirement seems to be overly burdensome. If an entity wants to challenge the need for data and can't resolve the issue with its RA, then that entity can use the dispute resolution process.
2. The industry as a whole is not in favor of a 'minimum' set of data. Any RA is free to copy the contents of Appendix 4B and include this as part of its data specification. Appendix 4B, by itself, would not meet all of the measures in this requirement.
3. There are many different ways of sorting the various requirements in this standard. Industry comments on the first version of the standard indicated a preference for putting related requirements together. If requirement 1.3 were moved to 206, this might increase confusion. In requirement 206, one RA has to provide data to another RA, and it may be confusing as to which RA had to notify the Compliance Monitor when data wasn't provided as specified.
4. There were several commenters who suggested changes to the reset period, and the standard was revised so that all requirements in this standard have the following language: "12 months from the last violation" This change supports your recommendation.

**Draft Comments and Considerations for 2<sup>nd</sup> Posting for Operate Within IROLs Standard Requirement 205 – Data Specification**

<p>Ed Davis Entergy Services #1  <u>SERC Operations Planning Subcommittee</u>  Carter Edge SEPA #4, 5  William Gaither So Carolina Pub Serv Auth #1  Mike Miller Southern Co #1  Roger Brand Muni Elec Auth GA #1  Phil Creech Progress Energy – CP&amp;L #1  Gene Delk So Carolina Elec &amp; Gas #1  Al McMeekin So Carolina Elec &amp; Gas #1  Greg Ott Alcoa-Yadkin #1  Doug Newbaue GA System Operations #1  Mike Clements TVA #1  Don Reichenbach Duke Energy #1  Lynna Estep SERC #2  Mark Creech TVA #1</p> <p>Susan Morris SERC #2  Bill Reinke SERC #2  Sam Stryker Fayettevill PWC #3, 4, 5  Carter Edge SEPA #4, 5  Bill Thompson Dominion Trans #1</p>	<ol style="list-style-type: none"> <li>1. Please see the comment to question (2), above, concerning the TOs responsibility and role with respect to this standard. If the developers of the standard insist on only one functional entity being responsible for this activity, then that functional entity should be the Transmission Owner. However, we view this activity as a shared activity between the TO and RA. Therefore, we suggest that every occurrence of the term “reliability authority” in all of this section 205 be replaced with “reliability authority and transmission owner”.</li> <li>2. The requirement for data collection should be tied to its impact on reliability. Requirement 1.3 should be modified to read: <ol style="list-style-type: none"> <li>1.3. The reliability authority shall notify its compliance monitor when an entity that has facilities monitored by the reliability authority does not provide data as specified <b>and this lack of data has an impact on reliability.</b></li> </ol> <p>Measurement 2.3.1 should be rewritten to read:</p> <p>2.3.1. The notification shall take place within five business days of discovering that the data <b>having an impact on reliability</b> is missing.</p> </li> <li>3. In order to prevent a shotgun approach to data collection we propose Section 2.1.1 be modified to read: <ol style="list-style-type: none"> <li>2.1.1. Specification shall include a list of <b>minimum</b> required data, a mutually agreeable format, and timeframe and periodicity for providing data.</li> </ol> </li> <li>4. Generally, the Measures should be tied to the Requirements and the Objective Evidence for Compliance (OEC) should be tied to the Measures. <p>Section 4.3 should be rewritten to read:</p> <p>4.3. The reliability authority shall have the following available upon the request of the compliance monitor:  Data specification(s) <b>in accordance with Measure 2.1</b></p> </li> </ol> <p>4.3.2. Proof of distribution of the data specification(s) <b>in accordance with Measure 2.2</b></p>
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**Draft Comments and Considerations for 2<sup>nd</sup> Posting for Operate Within IROLs Standard Requirement 205 – Data Specification**

<ol style="list-style-type: none"> <li>1. The Functional Model assigns responsibility for monitoring operating reliability limits and for conducting operating reliability analyses to the Reliability Authority and these new standards must be written in a manner that supports the delineation of responsibility outlined in the Functional Model. The data being addressed in this requirement is data needed to support real time monitoring and operational planning analyses and real-time assessments relative to IROLs. The Transmission Owner is not responsible for the same activities – so addressing the Transmission Owner’s data collection needs is outside the scope of this standard.</li> <li>2. The suggested change would link data collection with an instance of exceeding an IROL, and that could result in a multiple sanctions for the same violation. The standards are being drafted so that there will only be a single sanction for a single violation.</li> <li>3. The suggestion that the term, ‘minimum’ be added was not adopted since this is a subjective term and leaves room for arguments as to what minimum means.</li> <li>4. The suggested format change was not adopted. The standards have been drafted to be as succinct as possible – and the additional words do not add anything to the standard. In addition, when the standards are completed, they will be available to the industry in a relational database with search capabilities. If the suggested cross-referencing were adopted, and someone downloaded a report that listed just the compliance elements for this standard, the cross references would lead the reader to believe that additional information could be found in the measures –and in many cases this is not true.</li> </ol>	
<p>Alan Johnson Mirant Americas Energy Mktg #6</p>	<p>A little concerned that the entities required to provide data not have to submit the same data to multiple authorities. For example, some of the data that the RA will want from a generator operator for its models, should be the same data required by the PA for its models. The generator operator should only have to submit this data one time (to some central data collecting point), to be utilized by all functions that have a need for it. This should make the data collection processes more efficient for all and decrease the possibility of data errors.</p>
<p>Because of the way we are developing these new reliability standards, data collection is addressed in several standards. It did not seem possible to identify all the data that needs to be collected and distributed to all functions for all standards in advance of those standards being developed and approved. This standard is limited to collecting and providing data relative to monitoring, analyzing and assessing the bulk system relative to IROLs.</p>	
<p><u>Trans Subcommittee</u>          Robert E. Reed PJM          Daniel Cooper Michigan Public Power Agency          Ken Donohoo ERCOT          Michael Gildea Duke-Energy, North America          Francis Halpin Bonneville Power Administration          Tom Mallinger Midwest ISO          Darrick Moe Western Area Power Adm          Scott Moore American Electric Power</p>	<ol style="list-style-type: none"> <li>1) Requirement 205, 1.1, The TS recommends enhancing the last sentence to read “This includes specifying and collecting data from entities such as:”</li> <li>2) The TS recommends adding “1.1.6. Planning Authority.”</li> <li>3) The TS recommends enhancing 1.3. to read “The reliability authority shall notify its compliance monitor when an entity does not provide data as specified.”</li> </ol>

**Draft Comments and Considerations for 2<sup>nd</sup> Posting for Operate Within IROLs Standard Requirement 205 – Data Specification**

<p>Bill Slater Florida Power Corporation          Tom Stuchlik Western Resources          Joseph Styslinger Southern Company          David Thorne D. H. Thorne Consultants, Inc          Robert Waldele New York ISO          Roman Carter Southern Company          John Ahr Alleghany Power Systems          Susan Morris SERC          Ed Pfeiffer Ameren          Ray Palmieri ECAR          Tom Vandervort NERC</p>	
<ol style="list-style-type: none"> <li>1. The suggested change was not made because these standards need to clarify what functions must comply with the requirements. The recommended change would have made this more ambiguous.</li> <li>2. The planning authority is a recipient of data, and is not expected to have the type of data the RA needs to run analyses, assessments and for monitoring.</li> <li>3. The suggested change was not made because this requirement was modified to provide an opportunity for the RA to work out the problem before notifying the compliance monitor.</li> </ol>	
<p><u>Southern Company Generation &amp; Energy Mktg</u>          Roman Carter # 5, 6          Joel Dison #5,6          Tony Reed #5,6          Lucius Burris #5,6          David Deerman #5,6          Clifford Shepard #5,6          Michael Smith #5,6          Lloyd Barnes SCGEM 5,6          Gary Miller SCGEM 5,6          Terry Crawley Southern Generation 5          Roger Green Southern Generation 5</p>	<p>Transmission Operator should be added along with the Reliability Authority for section 205 1.1.1</p>
<p>The Functional Model assigns responsibility for monitoring operating reliability limits and for conducting operating reliability analyses to the Reliability Authority and these new standards must be written in a manner that supports the delineation of responsibility outlined in the Functional Model. The data being addressed in this requirement is data needed to support real time monitoring and operational planning analyses and real-time assessments relative to IROLs. The Transmission Operator is not responsible for the same activities – so addressing the Transmission Operator's data collection needs is outside the scope of this standard.</p>	



**Draft Comments and Considerations for 2<sup>nd</sup> Posting for Operate Within IROLs Standard Requirement 206 – Data Provision**

**Requirement 206 - Data Provision - Do you agree with the requirement?**

Commenter	Yes	No	Comments
Kathleen Goodman ISO-NE #2	x		
Terry Bilke Midwest ISO #2	x		
Ken Githens Allegheny Energy Supply #5	x		
William Smith Allegheny Power #1	x		
Stuart Goza TVA #1	x		
<u>NPCC CP9</u> Michael Schiavone National Grid USA #1 Roger Champagne Hydro-Quebec TransEnergie #1 Ralph Rufrano New York Power Authority #1 David Little Nova Scotia Power Inc. #1 David Kiguel Hydro One Networks #1 Michael Potishnak ISO-New England #2 Barry Gee National Grid USA #1 Dan Stosick ISO-New England #2 Fernando Saavedra ISO-New England #2 Greg Campoli New York ISO #2	x		
Peter Burke ATC #1	x		
Gerald Rheault Manitoba Hydro #1, 3, 5, 6	x		
<u>FRCC Op, Eng &amp; Mkt Int</u> Linda Campbell FRCC #2 Paul Elwing Lakeland Electric # 3 John Shaffer FPL #1 Bob Remley Clay Elec Coop #4 Patti Metro FRCC #2 Eirc Grant Progress Energy – FL #1 Joe Roos Ocala Electric Utility #3 Joe Krupar FL Muni Pwr Agency #3 Richard Gilbert Lakeland Electric #3 Bill Slater Progress Energy – FL #1 Amy Long Lakeland Electric #1 Roger Westphal Gainesville Regional Util #5 Bob Goss SEPA #5	x		

**Draft Comments and Considerations for 2<sup>nd</sup> Posting for Operate Within IROLs Standard Requirement 206 – Data Provision**

Steve Wallace Seminore Electric Coop #4 Ted Hobson JEA #1			
Alan Boesch NPPD #1	x		
Dan Boezio & Raj Rana AEP #1, 3, 5, 6	x		
Raymond Mammarella PPL Elec Util #1	x		
Tom Pruitt Duke Power #1	x		
Tony Jankowski We Energies #4	x		
Michael Sidiropoulos Pacificorp	x		
<u>Operating Reliability Working Group SPP</u> Gerry Burrows KCP&L #1 Bob Cochran SPS #1 Peter Kuebeck OG&E #1 Scott Moore AEP #1 Tom Stuchlik Westar #1 Dan Boezio AEP #1 Matt Bordelon CLECO #1 Mike Crouch WFECC #1 Mike Gammon KCP&L #1 Kevin Goolsby SPP #2 Bo Jones Westar #1 Allen Klassen Westar #1 Thad Ness AEP #1 Harold Wyble KCP&L #1 Robert Rhodes SPP #2	x		
Robert Grover PPL Elec Util #3	x		
<u>MAAP Ops Subcommittee #2</u> Llyod Linke MAPP Allan Silk Manitoba Hydro Paul Brune NPPD Tod Gosnell Omaha Public Pwr Dist Paul Koskela Minnesota Pwr Larry Larson Otter Tail Power Derrick Moe WAPA Dick Pursley Great River Energy	x		

**Draft Comments and Considerations for 2<sup>nd</sup> Posting for Operate Within IROLs Standard Requirement 206 – Data Provision**

Martin Trencé Xcel Energy Joseph Knight MAPPCOR			
John Horakh MAAC #2	x		
<u>BPA Adm TBL #1</u> James Murphy Mike Viles James Randall Al Johnson Jeff Newby Jim Gronquist Sylvia Wiggerhaus Brian Tuck Dick Spence Tracy Rolstad Steve Hitchens	x		
Darrell Richardson Illinois Power #1, 3	x		
David Thorne Pepco #1	x		
<u>SERC Operations Planning Subcommittee</u> Carter Edge SEPA #4, 5 William Gaither So Carolina Pub Serv Auth #1 Mike Miller Southern Co #1 Roger Brand Muni Elec Auth GA #1 Phil Creech Progress Energy – CP&L #1 Gene Delk So Carolina Elec & Gas #1 Al McMeekin So Carolina Elec & Gas #1 Greg Ott Alcoa-Yadkin #1 Doug Newbaue GA System Operations #1 Mike Clements TVA #1 Don Reichenbach Duke Energy #1 Lynna Estep SERC #2 Mark Creech TVA #1	x		
Albert DiCaprio MAAC #2	x		
Alan Johnson Mirant Americas Energy Mktg #6	x		
Mark Heimbach PPL Generation #6	x		
<u>Trans Subcommittee</u> Robert E. Reed PJM Daniel Cooper Michigan Public Power Agency Ken Donohoo ERCOT Michael Gildea Duke-Energy, North America	x		

**Draft Comments and Considerations for 2<sup>nd</sup> Posting for Operate Within IROLs Standard Requirement 206 – Data Provision**

Francis Halpin Bonneville Power Administration Tom Mallinger Midwest ISO Darrick Moe Western Area Power Adm Scott Moore American Electric Power Bill Slater Florida Power Corporation Tom Stuchlik Western Resources Joseph Stysliger Southern Company David Thorne D. H. Thorne Consultants, Inc Robert Waldele New York ISO Roman Carter Southern Company John Ahr Alleghany Power Systems Susan Morris SERC Ed Pfeiffer Ameren Ray Palmieri ECAR Tom Vandervort NERC			
<u>Southern Company Generation &amp; Energy Mktg</u> Roman Carter # 5, 6 Joel Dison #5,6 Tony Reed #5,6 Lucius Burris #5,6 David Deerman #5,6 Clifford Shepard #5,6 Michael Smith #5,6 Lloyd Barnes SCGEM 5,6 Gary Miller SCGEM 5,6 Terry Crawley Southern Generation 5 Roger Green Southern Generation 5	x		
<u>Centerpoint Energy #1</u> Richard Sikes John Jonte Wayne Kemper Glenn Hemperley Brad Calhoun	x	x	
Ed Davis Entergy Services #1		x	

**Draft Comments and Considerations for 2<sup>nd</sup> Posting for Operate Within IROLs Standard Requirement 206 – Data Provision**

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<u>Southern Co Transmission Planning #1</u> Todd Lucas Southern Co Joe Payne Mississippi Power Company Travis Koval Southern Co Bill Pope Gulf Power Company John Clark Southern Co David Johnson Savannah Electric Mike Miller Southern Co Jim Griffith Southern Co Monroe Landrum Southern Co		x	
Susan Morris SERC #2 Bill Reinke SERC #2 Sam Stryker Fayettevill PWC #3, 4, 5 Carter Edge SEPA #4, 5 Bill Thompson Dominion Trans #1		x	

**Draft Comments and Considerations for 2<sup>nd</sup> Posting for Operate Within IROLs Standard Requirement 206 – Data Provision**

**Requirement 206 - Data Provision - Do you agree with the measures?**

Commenter	Yes	No	Comments
Kathleen Goodman ISO-NE #2	x		
Terry Bilke Midwest ISO #2	x		
Ken Githens Allegheny Energy Supply #5	x		
William Smith Allegheny Power #1	x		
Stuart Goza TVA #1	x		
<u>NPCC CP9</u> Michael Schiavone National Grid USA #1 Roger Champagne Hydro-Quebec TransEnergie #1 Ralph Rufrano New York Power Authority #1 David Little Nova Scotia Power Inc. #1 David Kiguel Hydro One Networks #1 Michael Potishnak ISO-New England #2 Barry Gee National Grid USA #1 Dan Stosick ISO-New England #2 Fernando Saavedra ISO-New England #2 Greg Campoli New York ISO #2	x		
<u>Southern Co Transmission Planning #1</u> Todd Lucas Southern Co Joe Payne Mississippi Power Company Travis Koval Southern Co Bill Pope Gulf Power Company John Clark Southern Co David Johnson Savannah Electric Mike Miller Southern Co Jim Griffith Southern Co Monroe Landrum Southern Co	x		
Peter Burke ATC #1	x		
Gerald Rheault Manitoba Hydro #1, 3, 5, 6	x		
<u>FRCC Op, Eng &amp; Mkt Int</u> Linda Campbell FRCC #2 Paul Elwing Lakeland Electric # 3 John Shaffer FPL #1 Bob Remley Clay Elec Coop #4	x		

**Draft Comments and Considerations for 2<sup>nd</sup> Posting for Operate Within IROLs Standard Requirement 206 – Data Provision**

Patti Metro FRCC #2 Eirc Grant Progress Energy – FL #1 Joe Roos Ocala Electric Utility #3 Joe Krupar FL Muni Pwr Agency #3 Richard Gilbert Lakeland Electric #3 Bill Slater Progress Energy – FL #1 Amy Long Lakeland Electric #1 Roger Westphal Gainesville Regional Util #5 Bob Goss SEPA #5 Steve Wallace Seminore Electric Coop #4 Ted Hobson JEA #1			
Dan Boezio & Raj Rana AEP #1, 3, 5, 6	x		
Raymond Mammarella PPL Elec Util #1	x		
Tom Pruitt Duke Power #1	x		
Tony Jankowski We Energies #4	x		
Michael Sidiropoulos Pacificorp	x		
<u>Operating Reliability Working Group SPP</u> Gerry Burrows KCP&L #1 Bob Cochran SPS #1 Peter Kuebeck OG&E #1 Scott Moore AEP #1 Tom Stuchlik Westar #1 Dan Boezio AEP #1 Matt Bordelon CLECO #1 Mike Crouch WFECC #1 Mike Gammon KCP&L #1 Kevin Goolsby SPP #2 Bo Jones Westar #1 Allen Klassen Westar #1 Thad Ness AEP #1 Harold Wyble KCP&L #1 Robert Rhodes SPP #2	x		
Robert Grover PPL Elec Util #3	x		
<u>Southern Co Transmission Planning</u>	x		

**Draft Comments and Considerations for 2<sup>nd</sup> Posting for Operate Within IROLs Standard Requirement 206 – Data Provision**

Todd Lucas Southern Co #1 Joe Payne Mississippi Pwr Co #3 Travis Koval Southern Co #1 Bill Pope Gulf Pwr Co #3 John Clark Southern Co #1 David Johnson Savannah Electric #3			
John Horakh MAAC #2	x		
<u>BPA Adm TBL #1</u> James Murphy Mike Viles James Randall Al Johnson Jeff Newby Jim Gronquist Sylvia Wiggerhaus Brian Tuck Dick Spence Tracy Rolstad Steve Hitchens	x		
Darrell Richardson Illinois Power #1, 3	x		
David Thorne Pepco #1	x		
<u>SERC Operations Planning Subcommittee</u> Carter Edge SEPA #4, 5 William Gaither So Carolina Pub Serv Auth #1 Mike Miller Southern Co #1 Roger Brand Muni Elec Auth GA #1 Phil Creech Progress Energy – CP&L #1 Gene Delk So Carolina Elec & Gas #1 Al McMeekin So Carolina Elec & Gas #1 Greg Ott Alcoa-Yadkin #1 Doug Newbaue GA System Operations #1 Mike Clements TVA #1 Don Reichenbach Duke Energy #1 Lynna Estep SERC #2 Mark Creech TVA #1	x		
Albert DiCaprio MAAC #2	x		
Alan Johnson Mirant Americas Energy Mktg #6	x		
Mark Heimbach PPL Generation #6	x		
<u>Centerpoint Energy #1</u>	x		



**Draft Comments and Considerations for 2<sup>nd</sup> Posting for Operate Within IROLs Standard Requirement 206 – Data Provision**

Richard Sikes John Jonte Wayne Kemper Glenn Hemperley Brad Calhoun			
<u>Trans Subcommittee</u> Robert E. Reed PJM Daniel Cooper Michigan Public Power Agency Ken Donohoo ERCOT Michael Gildea Duke-Energy, North America Francis Halpin Bonneville Power Administration Tom Mallinger Midwest ISO Darrick Moe Western Area Power Adm Scott Moore American Electric Power Bill Slater Florida Power Corporation Tom Stuchlik Western Resources Joseph Styslinger Southern Company David Thorne D. H. Thorne Consultants, Inc Robert Waldele New York ISO Roman Carter Southern Company John Ahr Alleghany Power Systems Susan Morris SERC Ed Pfeiffer Ameren Ray Palmieri ECAR Tom Vandervort NERC	x		

**Draft Comments and Considerations for 2<sup>nd</sup> Posting for Operate Within IROLs Standard Requirement 206 – Data Provision**

<u>Southern Company Generation &amp; Energy Mktg</u> Roman Carter # 5, 6 Joel Dison #5,6 Tony Reed #5,6 Lucius Burris #5,6 David Deerman #5,6 Clifford Shepard #5,6 Michael Smith #5,6 Lloyd Barnes SCGEM 5,6 Gary Miller SCGEM 5,6 Terry Crawley Southern Generation 5 Roger Green Southern Generation 5	x		
Alan Boesch NPPD #1		x	
Susan Morris SERC #2 Bill Reinke SERC #2 Sam Stryker Fayettevill PWC #3, 4, 5 Carter Edge SEPA #4, 5 Bill Thompson Dominion Trans #1		x	
<u>MAAP Ops Subcommittee #2</u> Llyod Linke MAPP Allan Silk Manitoba Hydro Paul Brune NPPD Tod Gosnell Omaha Public Pwr Dist Paul Koskela Minnesota Pwr Larry Larson Otter Tail Power Derrick Moe WAPA Dick Pursley Great River Energy Martin Trencce Xcel Energy Joseph Knight MAPPCOR		x	
Ed Davis Entergy Services #1		x	

**Draft Comments and Considerations for 2<sup>nd</sup> Posting for Operate Within IROLs Standard Requirement 206 – Data Provision**

**Requirement 206 - Data Provision - Do you agree with the compliance monitoring process?**

Commenter	Yes	No	Comments
Terry Bilke Midwest ISO #2	x		
Ken Githens Allegheny Energy Supply #5	x		
<u>Compliance Subcommittee</u>			OK
William Smith Allegheny Power #1	x		
<u>NPCC CP9</u> Michael Schiavone National Grid USA #1 Roger Champagne Hydro-Quebec TransEnergie #1 Ralph Rufrano New York Power Authority #1 David Little Nova Scotia Power Inc. #1 David Kiguel Hydro One Networks #1 Michael Potishnak ISO-New England #2 Barry Gee National Grid USA #1 Dan Stosick ISO-New England #2 Fernando Saavedra ISO-New England #2 Greg Campoli New York ISO #2	x		
<u>Southern Co Transmission Planning #1</u> Todd Lucas Southern Co Joe Payne Mississippi Power Company Travis Koval Southern Co Bill Pope Gulf Power Company John Clark Southern Co David Johnson Savannah Electric Mike Miller Southern Co Jim Griffith Southern Co Monroe Landrum Southern Co	x		
Peter Burke ATC #1	x		
Gerald Rheault Manitoba Hydro #1, 3, 5, 6	x		
<u>FRCC Op, Eng &amp; Mkt Int</u> Linda Campbell FRCC #2 Paul Elwing Lakeland Electric #3 John Shaffer FPL #1 Bob Remley Clay Elec Coop #4 Patti Metro FRCC #2	x		

**Draft Comments and Considerations for 2<sup>nd</sup> Posting for Operate Within IROLs Standard Requirement 206 – Data Provision**

Eirc Grant Progress Energy – FL #1 Joe Roos Ocala Electric Utility #3 Joe Krupar FL Muni Pwr Agency #3 Richard Gilbert Lakeland Electric #3 Bill Slater Progress Energy – FL #1 Amy Long Lakeland Electric #1 Roger Westphal Gainesville Regional Util #5 Bob Goss SEPA #5 Steve Wallace Seminore Electric Coop #4 Ted Hobson JEA #1			
Raymond Mammarella PPL Elec Util #1	x		
Michael Sidiropoulos Pacificorp	x		
Robert Grover PPL Elec Util #3	x		
John Horakh MAAC #2	x		
<u>BPA Adm TBL #1</u> James Murphy Mike Viles James Randall Al Johnson Jeff Newby Jim Gronquist Sylvia Wiggerhaus Brian Tuck Dick Spence Tracy Rolstad Steve Hitchens	x		
Darrell Richardson Illinois Power #1, 3	x		
David Thorne Pepco #1	x		
Ed Davis Entergy Services #1	x		
Albert DiCaprio MAAC #2	x		
Alan Johnson Mirant Americas Energy Mktg #6	x		
Mark Heimbach PPL Generation #6	x		
<u>Centerpoint Energy #1</u> Richard Sikes John Jonte Wayne Kemper Glenn Hemperley Brad Calhoun	x		

**Draft Comments and Considerations for 2<sup>nd</sup> Posting for Operate Within IROLs Standard Requirement 206 – Data Provision**

<u>Trans Subcommittee</u> Robert E. Reed PJM Daniel Cooper Michigan Public Power Agency Ken Donohoo ERCOT Michael Gildea Duke-Energy, North America Francis Halpin Bonneville Power Administration Tom Mallinger Midwest ISO Darrick Moe Western Area Power Adm Scott Moore American Electric Power Bill Slater Florida Power Corporation Tom Stuchlik Western Resources Joseph Styslinger Southern Company David Thorne D. H. Thorne Consultants, Inc Robert Waldele New York ISO Roman Carter Southern Company John Ahr Alleghany Power Systems Susan Morris SERC Ed Pfeiffer Ameren Ray Palmieri ECAR Tom Vandervort NERC	x		
<u>Southern Company Generation &amp; Energy Mktg</u> Roman Carter # 5, 6 Joel Dison #5,6 Tony Reed #5,6 Lucius Burris #5,6 David Deerman #5,6 Clifford Shepard #5,6 Michael Smith #5,6 Lloyd Barnes SCGEM 5,6 Gary Miller SCGEM 5,6 Terry Crawley Southern Generation 5 Roger Green Southern Generation 5	x		
Tony Jankowski We Energies #4		x	4.2 Should not be a rolling time frame.

**Draft Comments and Considerations for 2<sup>nd</sup> Posting for Operate Within IROLs Standard Requirement 206 – Data Provision**

<p>There were several commenters who suggested changes to the reset period, and the standard was revised so that all requirements in this standard have the following language: "12 months from the last violation" This change supports your recommendation.</p>			
Tom Pruitt Duke Power #1		x	
Alan Boesch NPPD #1		x	
Susan Morris SERC #2 Bill Reinke SERC #2 Sam Stryker Fayettevill PWC #3, 4, 5 Carter Edge SEPA #4, 5 Bill Thompson Dominion Trans #1		x	
Dan Boezio & Raj Rana AEP #1, 3, 5, 6		x	
<u>Operating Reliability Working Group SPP</u> Gerry Burrows KCP&L #1 Bob Cochran SPS #1 Peter Kuebeck OG&E #1 Scott Moore AEP #1 Tom Stuchlik Westar #1 Dan Boezio AEP #1 Matt Bordelon CLECO #1 Mike Crouch WFEC #1 Mike Gammon KCP&L #1 Kevin Goolsby SPP #2 Bo Jones Westar #1 Allen Klassen Westar #1 Thad Ness AEP #1 Harold Wyble KCP&L #1 Robert Rhodes SPP #2		x	
<u>MAAP Ops Subcommittee #2</u> Llyod Linke MAPP Allan Silk Manitoba Hydro Paul Brune NPPD Tod Gosnell Omaha Public Pwr Dist Paul Koskela Minnesota Pwr Larry Larson Otter Tail Power		x	

**Draft Comments and Considerations for 2<sup>nd</sup> Posting for Operate Within IROLs Standard Requirement 206 – Data Provision**

Derrick Moe WAPA Dick Pursley Great River Energy Martin Trencé Xcel Energy Joseph Knight MAPPCOR			
Stuart Goza TVA #1		x	
<u>SERC Operations Planning Subcommittee</u> Carter Edge SEPA #4, 5 William Gaither So Carolina Pub Serv Auth #1 Mike Miller Southern Co #1 Roger Brand Muni Elec Auth GA #1 Phil Creech Progress Energy – CP&L #1 Gene Delk So Carolina Elec & Gas #1 Al McMeekin So Carolina Elec & Gas #1 Greg Ott Alcoa-Yadkin #1 Doug Newbaue GA System Operations #1 Mike Clements TVA #1 Don Reichenbach Duke Energy #1 Lynna Estep SERC #2 Mark Creech TVA #1		x	
Kathleen Goodman ISO-NE #2		x	

**Draft Comments and Considerations for 2<sup>nd</sup> Posting for Operate Within IROLs Standard Requirement 206 – Data Provision**

**Requirement 206 - Data Provision - Do you agree with the levels of non-compliance?**

Commenter	Yes	No	Comments
Ken Githens Allegheny Energy Supply #5	x		
William Smith Allegheny Power #1	x		
<u>Southern Co Transmission Planning #1</u> Todd Lucas Southern Co Joe Payne Mississippi Power Company Travis Koval Southern Co Bill Pope Gulf Power Company John Clark Southern Co David Johnson Savannah Electric Mike Miller Southern Co Jim Griffith Southern Co Monroe Landrum Southern Co	x		
Peter Burke ATC #1	x		
Gerald Rheault Manitoba Hydro #1, 3, 5, 6	x		
<u>FRCC Op, Eng &amp; Mkt Int</u> Linda Campbell FRCC #2 Paul Elwing Lakeland Electric #3 John Shaffer FPL #1 Bob Remley Clay Elec Coop #4 Patti Metro FRCC #2 Eirc Grant Progress Energy – FL #1 Joe Roos Ocala Electric Utility #3 Joe Krupar FL Muni Pwr Agency #3 Richard Gilbert Lakeland Electric #3 Bill Slater Progress Energy – FL #1 Amy Long Lakeland Electric #1 Roger Westphal Gainesville Regional Util #5 Bob Goss SEPA #5 Steve Wallace Seminore Electric Coop #4 Ted Hobson JEA #1	x		
Raymond Mammarella PPL Elec Util #1	x		
Tom Pruitt Duke Power #1	x		



**Draft Comments and Considerations for 2<sup>nd</sup> Posting for Operate Within IROLs Standard Requirement 206 – Data Provision**

Tony Jankowski We Energies #4	x		
Michael Sidiropoulos Pacificorp	x		
Robert Grover PPL Elec Util #3	x		
<u>Southern Co Transmission Planning</u> Todd Lucas Southern Co #1 Joe Payne Mississippi Pwr Co #3 Travis Koval Southern Co #1 Bill Pope Gulf Pwr Co #3 John Clark Southern Co #1 David Johnson Savannah Electric #3	x		
John Horakh MAAC #2	x		
<u>BPA Adm TBL #1</u> James Murphy Mike Viles James Randall Al Johnson Jeff Newby Jim Gronquist Sylvia Wiggerhaus Brian Tuck Dick Spence Tracy Rolstad Steve Hitchens	x		
Darrell Richardson Illinois Power #1, 3	x		
David Thorne Pepco #1	x		
Ed Davis Entergy Services #1	x		
Albert DiCaprio MAAC #2	x		
Mark Heimbach PPL Generation #6	x		
<u>Centerpoint Energy #1</u> Richard Sikes John Jonte Wayne Kemper Glenn Hemperley Brad Calhoun	x		

**Draft Comments and Considerations for 2<sup>nd</sup> Posting for Operate Within IROLs Standard Requirement 206 – Data Provision**

<u>Southern Company Generation &amp; Energy Mktg</u> Roman Carter # 5, 6 Joel Dison #5,6 Tony Reed #5,6 Lucius Burris #5,6 David Deerman #5,6 Clifford Shepard #5,6 Michael Smith #5,6 Lloyd Barnes SCGEM 5,6 Gary Miller SCGEM 5,6 Terry Crawley Southern Generation 5 Roger Green Southern Generation 5	x		
Susan Morris SERC #2 Bill Reinke SERC #2 Sam Stryker Fayettevill PWC #3, 4, 5 Carter Edge SEPA #4, 5 Bill Thompson Dominion Trans #1		x	
Terry Bilke Midwest ISO #2		x	
Alan Boesch NPPD #1		x	
Dan Boezio & Raj Rana AEP #1, 3, 5, 6		x	
Kathleen Goodman ISO-NE #2		x	
<u>Operating Reliability Working Group SPP</u> Gerry Burrows KCP&L #1 Bob Cochran SPS #1 Peter Kuebeck OG&E #1 Scott Moore AEP #1 Tom Stuchlik Westar #1 Dan Boezio AEP #1 Matt Bordelon CLECO #1 Mike Crouch WFEC #1 Mike Gammon KCP&L #1 Kevin Goolsby SPP #2 Bo Jones Westar #1 Allen Klassen Westar #1		x	

**Draft Comments and Considerations for 2<sup>nd</sup> Posting for Operate Within IROLs Standard Requirement 206 – Data Provision**

Thad Ness AEP #1 Harold Wyble KCP&L #1 Robert Rhodes SPP #2			
<u>MAAP Ops Subcommittee #2</u> Llyod Linke MAPP Allan Silk Manitoba Hydro Paul Brune NPPD Tod Gosnell Omaha Public Pwr Dist Paul Koskela Minnesota Pwr Larry Larson Otter Tail Power Derrick Moe WAPA Dick Pursley Great River Energy Martin Trencce Xcel Energy Joseph Knight MAPPCOR		x	
<u>SERC Operations Planning Subcommittee</u> Carter Edge SEPA #4, 5 William Gaither So Carolina Pub Serv Auth #1 Mike Miller Southern Co #1 Roger Brand Muni Elec Auth GA #1 Phil Creech Progress Energy – CP&L #1 Gene Delk So Carolina Elec & Gas #1 Al McMeekin So Carolina Elec & Gas #1 Greg Ott Alcoa-Yadkin #1 Doug Newbaue GA System Operations #1 Mike Clements TVA #1 Don Reichenbach Duke Energy #1 Lynna Estep SERC #2 Mark Creech TVA #1		x	
Stuart Goza TVA #1		x	
<u>NPCC CP9</u> Michael Schiavone National Grid USA #1 Roger Champagne Hydro-Quebec TransEnergie #1 Ralph Rufrano New York Power Authority #1 David Little Nova Scotia Power Inc. #1		x	

**Draft Comments and Considerations for 2<sup>nd</sup> Posting for Operate Within IROLs Standard Requirement 206 – Data Provision**

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David Kiguel	Hydro One Networks	#1			
Michael Potishnak	ISO-New England	#2			
Barry Gee	National Grid USA	#1			
Dan Stosick	ISO-New England	#2			
Fernando Saavedra	ISO-New England	#2			
Greg Campoli	New York ISO	#2			
Alan Johnson	Mirant Americas Energy Mktg	#6		x	

**Draft Comments and Considerations for 2<sup>nd</sup> Posting for Operate Within IROLs Standard Requirement 206 – Data Provision**

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**Requirement 206 - Data Provision –Other comments**

**Summary Consideration:** While there were many comments recommending specific changes, most commenters indicated support of the requirement, its measures and compliance elements. The following changes were made to further improve the level of consensus on this requirement:

- The BA and LSE were added to the list of functions that must comply with this requirement – this change was made to conform with the changes made to requirement 205.
- A sentence was added to the requirement to clarify that the data to be provided under this requirement is limited to data needed by the RA to support real-time monitoring, operational planning analyses and real-time assessments conducted relative to operating within its reliability area’s IROLs.
- The compliance monitoring process was modified to change the performance reset period to ‘12 months from the last violation’.
- The compliance monitoring process was also modified to broaden the scope of evidence that could be used to demonstrate compliance. As many commenters indicated, a cover letter is not sent with real-time data and it isn’t reasonable to request this. The standard was revised as follows: Evidence indicating data was sent to the reliability authority or evidence that the entity responsible committed to providing the data on the specification. Copies of transmittal cover letters indicating data was sent to the reliability authority.

The SDT was unable to accommodate the changes recommending that the TOP and TOW be added to the list of recipients for data. The data being provided in this requirement is data needed to monitor, analyze and assess the system with respect to IROLs – and this activity is assigned to the RA, not the TOP or the TOW.

The recommendation that additional levels of non-compliance be added was not adopted. Most industry commenters favored the levels of non-compliance as proposed, and the result of having data supplied, but not in the agreed upon format, having data supplied late, and having incomplete data is all the same – the RA doesn’t have the data it needs to support monitoring, analyses and assessments relative to IROLs for its reliability area. The level four non-compliance was adjusted to add language to indicate that there is only a level four if data was not provided as specified and the RA was unable to resolve the issue. This should preclude any sanctions for omissions that can be resolved between the entities involved.

Commenter	Comments
Terry Bilke Midwest ISO #2	<p>This section appears to have an “all or nothing” format. The RA needs a great deal of information to fulfill its obligations. The “level 4” violation should only be for failure to provide data on IROL elements. There should perhaps be some scaled compliance level for failure to provide other data, such as:</p> <p>Level 1: failure to provide 10% of the RA’s required data or data transmission failures greater than X% of the year.</p> <p>Level 2: failure to provide 10% of the RA’s required data or data transmission failures greater than X% of the year.</p> <p>Level 3: failure to provide 10% of the RA’s required data or data transmission failures greater than X% of the year</p>

**Draft Comments and Considerations for 2<sup>nd</sup> Posting for Operate Within IROLs Standard Requirement 206 – Data Provision**

	Level 4: failure to provide data for any IROL or pre-contingent condition.
<p>The standard has been revised to clarify that the only data addressed by this requirement is data the RA needs to monitor, analyze and assess the system with respect to IROLs.</p>	
<p>The level four non-compliance was adjusted to add language to indicate that there is only a level four if data was not provided as specified and the RA was unable to resolve the issue. This should preclude any sanctions for omissions that can be resolved between the entities involved.</p>	
Ken Githens Allegheny Energy Supply #5	<p>However, refer to comment under question 37.</p> <p>(RA data collection and communication is required under Std. 200 and 600 with financial sanction for noncompliance under both. An organization should not be hit with financial sanctions under both standards for not communicating the data. Only one standard should apply.)</p>
<p>The Determine Facility Ratings, System Operating Limits and Transfer Capabilities standard does require that equipment owners provide facility ratings data to the RA for the development of System Operating Limits. If the same data is needed by the RA for both standards, then it is up to the compliance manager to determine the appropriate sanction. We sent a letter to the Director, Compliance, suggesting that the Compliance Enforcement Program develop a formal way of addressing situations such as this, but preventing this from happening is beyond the scope of the SDT.</p>	
Stuart Goza TVA #1	<p>Generally, the Measures should be tied to the Requirements and the Objective Evidence for Compliance (OEC) should be tied to the Measures.</p> <p>Section 4.3.1 is too specific for the measure it supports. A possible solution might be:</p> <p>4.3.1. Documentation indicating data was sent to the reliability authority in accordance with Measure 2.1</p> <p>Non-compliance in data submission could take several forms and levels of impact to reliability. Section 5 should be modified as follows:</p> <p>5. Levels of Non-compliance:</p> <p>5.1. Level one: Data was provided, but not in the mutually agreed format</p> <p>5.2. Level two: Data was provided, but not within the time-frame specified</p> <p>5.3. Level three: Incomplete data was provided</p> <p>5.4. Level four: Data was not provided to the reliability authority as specified.</p>

**Draft Comments and Considerations for 2<sup>nd</sup> Posting for Operate Within IROLs Standard Requirement 206 – Data Provision**

The suggested format change was not adopted. The standards have been drafted to be as succinct as possible – and the additional words do not add anything to the standard. In addition, when the standards are completed, they will be available to the industry in a relational database with search capabilities. If the suggested cross-referencing were adopted, and someone downloaded a report that listed just the compliance elements for this standard, the cross references would lead the reader to believe that additional information could be found in the measures – and in many cases this is not true.

The result of having data supplied, but not in the agreed upon format, having data supplied late, and having incomplete data is all the same – the RA doesn't have the data it needs to support monitoring, analyses and assessments relative to IROLs for its reliability area. The level four non-compliance was adjusted to add language to indicate that there is only a level four if data was not provided as specified and the RA was unable to resolve the issue. This should preclude any sanctions for omissions that can be resolved between the entities involved.

Kathleen Goodman ISO-NE #2  
NPCC CP9  
 Michael Schiavone National Grid USA #1  
 Roger Champagne Hydro-Quebec TransEnergie #1  
 Ralph Rufrano New York Power Authority #1  
 David Little Nova Scotia Power Inc. #1  
 David Kiguel Hydro One Networks #1  
 Michael Potishnak ISO-New England #2  
 Barry Gee National Grid USA #1  
 Dan Stosick ISO-New England #2  
 Fernando Saavedra ISO-New England #2  
 Greg Campoli New York ISO #2

Regarding the level of non-compliance for not providing data to the reliability authority, NPCC (ISO-NE) feels that there should be some differentiation between not submitting any data and submitting partial data or new/additional data and perhaps there needs to be some more granularity in the description of what constitutes non-compliance.

The result of having data supplied, but not in the agreed upon format, having data supplied late, and having incomplete data is all the same – the RA doesn't have the data it needs to support monitoring, analyses and assessments relative to IROLs for its reliability area. The level four non-compliance was adjusted to add language to indicate that there is only a level four if data was not provided as specified and the RA was unable to resolve the issue. This should preclude any sanctions for omissions that can be resolved between the entities involved.

Southern Co Transmission Planning #1  
 Todd Lucas Southern Co  
 Joe Payne Mississippi Power Company  
 Travis Koval Southern Co  
 Bill Pope Gulf Power Company  
 John Clark Southern Co  
 David Johnson Savannah Electric  
 Mike Miller Southern Co  
 Jim Griffith Southern Co  
 Monroe Landrum Southern Co

The Transmission Operator should also be included in this requirement for "the areas for which they are responsible".

**Draft Comments and Considerations for 2<sup>nd</sup> Posting for Operate Within IROLs Standard Requirement 206 – Data Provision**

The Functional Model assigns responsibility for monitoring operating reliability limits and for conducting operating reliability analyses to the Reliability Authority and these new standards must be written in a manner that supports the delineation of responsibility outlined in the Functional Model. The data being provided in this requirement is data needed to support real time monitoring and operational planning analyses and real-time assessments relative to IROLs. The Transmission Operator is responsible for local network integrity, not the reliability of the bulk transmission system and does not need to receive the data identified in this requirement.

Susan Morris SERC #2

Bill Reinke SERC #2

Sam Stryker Fayettevill PWC #3, 4, 5

Carter Edge SEPA #4, 5

Bill Thompson Dominion Trans #1

1. Please see the comment to question (2), above, concerning the TOs responsibility and role with respect to this standard. If the developers of the standard insist on only one functional entity being responsible for this activity, then that functional entity should be the Transmission Owner. However, we view this activity as a shared activity between the TO(s) and RA. Therefore, we suggest that every occurrence of the term “reliability authority” in all of this section 206 be replaced with “reliability authority and transmission owner(s)”.
2. Add planning authority(ies) to the list of functions in section 1.1.1 that have a reliability relationship and shall provide data (particularly results of dynamic analysis) to the reliability authority and transmission owner(s).
3. Generally, the Measures should be tied to the Requirements and the Objective Evidence for Compliance (OEC) should be tied to the Measures.
4. Section 4.3.1 is too specific for the measure it supports. A possible solution might be:  
  
Documentation indicating data was sent to the reliability authority in accordance with Measure 2.1
5. Non-compliance in data submission could take several forms and levels of impact to reliability. Section 5 should be modified as follows:  
  
5. Levels of Non-compliance:
  - 5.1. Level one: Data was provided, but not in the mutually agreed format
  - 5.2. Level two: Data was provided, but not within the time-frame specified
  - 5.3. Level three: Incomplete data was provided
  - 5.4. Level four: Data was not provided to the reliability authority as specified.



## Draft Comments and Considerations for 2<sup>nd</sup> Posting for Operate Within IROLs Standard Requirement 206 – Data Provision

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1. The Functional Model assigns responsibility for monitoring operating reliability limits and for conducting operating reliability analyses to the Reliability Authority and these new standards must be written in a manner that supports the delineation of responsibility outlined in the Functional Model. The data being provided in this requirement is data needed to support real time monitoring and operational planning analyses and real-time assessments relative to IROLs. The Transmission Owner is not responsible for the reliability of the bulk transmission system and does not need to receive this data identified in this requirement.
2. The latest version of the draft changes to the Functional Model did not address the suggested addition, so it was not added.
3. The suggested format change was not adopted. The standards have been drafted to be as succinct as possible – and the additional words do not add anything to the standard. In addition, when the standards are completed, they will be available to the industry in a relational database with search capabilities. If the suggested cross-referencing were adopted, and someone downloaded a report that listed just the compliance elements for this standard, the cross references would lead the reader to believe that additional information could be found in the measures –and in many cases this is not true.
4. Agreed. The suggestion made improves upon the original language, but doesn't address evidence that real time data has been sent. Section 4.3.1 was changed as follows. Evidence indicating data was sent to the reliability authority or evidence that the entity responsible committed to providing the data on the specification. ~~Copies of transmittal cover letters indicating data was sent to the reliability authority.~~
5. The result of having data supplied, but not in the agreed upon format, having data supplied late, and having incomplete data is all the same – the RA doesn't have the data it needs to support monitoring, analyses and assessments relative to IROLs for its reliability area.

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<p>Alan Boesch NPPD #1</p>	<p>Step 4.3.1 is not necessarily going to be required. Real time data will not have a cover letter. I would suggest that it should be re-worded to say: "Provide evidence that data was sent to the reliability authority."</p> <p>The measure and level of non-compliance does not address failure to provide data because of broken equipment. If an entity temporarily fails to provide real time data because of a failure of a RTU would it be considered a level four non-compliance?</p>
<p>The compliance monitoring section of the standard was revised to reflect your suggestions: Evidence indicating data was sent to the reliability authority or evidence that the entity responsible committed to providing the data on the specification. Copies of transmittal cover letters indicating data was sent to the reliability authority.</p> <p>The data specification issued by the RA under requirement 205 must identify how real time data will be supplied when there are telecommunication failures. As long as the data is supplied as specified, there is no sanction. (205.2.1.2 Specification shall address the data provision process to use when automated real-time system operating data is unavailable.)</p>	
<p>Dan Boezio &amp; Raj Rana AEP #1, 3, 5, 6</p>	<ol style="list-style-type: none"> <li>1. Defined terms should be capitalized, such as "Reliability Authority", "Operational Planning Analyses", "Interconnected Reliability Operating Limits", etc</li> <li>2. The compliance sections of Requirements 205 and 206 are not complimentary. If the RA doesn't have a data specification for an entities data, even if the RA really needs and should have that data, the maximum level of non-compliance for the RA is a level two. However, if an entity does not provide the data as specified, that entity is level 4 non-compliant, even if the data requested is not critical. Depending on how the RA writes his specification, an entity could be in violation of Requirement 206 if only a few pieces of individual data are missing, regardless of the criticality of that data.</li> <li>3. Need to refer to non-compliance of meeting the data quality and availability protocols (see comments for section 205) established by the Reliability Authority.</li> <li>4. Additionally, Section 205 1.3 and 2.3 should either be placed in a new section regarding data collection by the Reliability Authority or they should be contained within this section.</li> <li>5. 206.4.3.1: "Copies of transmittal cover letters indicating data was sent to the reliability authority." This is too vague. A lot of the data covered by this requirement is real-time or near real-time data that is sent via an ICCP connection. Is the required transmittal letter the letter that initially set up the link between the two parties? As worded one could even take the position that the entity responsible is required to send a transmittal cover letter every time they send data via the ICCP link. The SDT should rewrite this requirement to better reflect their desired intent.</li> <li>6. An example to consider: A RA has in his data specification the requirement that a certain piece or pieces of data be provided to the RA every 5 seconds. However,</li> </ol>

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	<p>the entity with the data has systems in place that only report/refresh the desired data on an exception basis, such as breaker status is provided only when the breaker changes states. Per requirement 206, the data providing entity would be level 4 non-compliant. However, the RA would have the data they need in order to perform their required assessments and monitor the system. So why would the data providing entity still be able to be found non-compliant? This also goes to the heart of the issue of the RA having to justify the reasonableness of his data specification before a data providing entity would be required to spend significant dollars in order to meet the RA's arbitrary specification.</p>
<ol style="list-style-type: none"> <li>1. The suggestion that defined terms be capitalized has been adopted and is reflected in the revised standard.</li> <li>2. Both requirements 205 and 206 were modified to add a provision that if the RA is able to resolve the issue of not receiving the data it needs, then the RA does not need to notify its compliance monitor. There is only a level four non-compliance for requirement 206 if the entity does not provide the data as specified AND the entity is unable to resolve the discrepancy with its RA.</li> <li>3. Addressing data quality and protocols is outside the scope of this standard.</li> <li>4. Most industry commenters requested that related requirements be grouped together.</li> <li>5. The standard was revised as follows: Evidence indicating data was sent to the reliability authority or evidence that the entity responsible committed to providing the data on the specification. Copies of transmittal cover letters indicating data was sent to the reliability authority.</li> <li>6. The SDT tried to accommodate most industry commenters by balancing the needs of the RA against the needs of other functions. Under the Functional Model, the RA has been assigned a great deal of responsibility. Other functions must work cooperatively with the RA so the RA has the information needed, when needed, to make reasonable decisions to protect the interconnected transmission system. The standard includes language to indicate that the data must be provided in a 'mutually agreed upon format'. This language was included to try and address the RA's needs as well as the needs of the rest of the industry. Requiring that every element of the data specification be, 'mutually agreeable' seemed unwieldy, and requiring the RA to justify every element of its data specification also seems unwieldy.</li> </ol>	
<p>Tom Pruitt Duke Power #1</p>	<p>For consistency with previous sections, replace the first sentence in section 206.4.2 with "The performance-reset period shall be one calendar year."</p>
<p>There were several commenters who suggested changes to the reset period, and the standard was revised so that all requirements in this standard have the following language: "12 months from the last violation" This change supports your recommendation.</p>	

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<p><u>Operating Reliability Working Group SPP</u>          Gerry Burrows KCP&amp;L #1          Bob Cochran SPS #1          Peter Kuebeck OG&amp;E #1          Scott Moore AEP #1          Tom Stuchlik Westar #1          Dan Boezio AEP #1          Matt Bordelon CLECO #1          Mike Crouch WFEC #1          Mike Gammon KCP&amp;L #1          Kevin Goolsby SPP #2          Bo Jones Westar #1          Allen Klassen Westar #1          Thad Ness AEP #1          Harold Wyble KCP&amp;L #1          Robert Rhodes SPP #2</p>	<ol style="list-style-type: none"> <li>1. The cover letter requirement in 4.3.1 is confusing and needs clarification. While such a letter can provide evidence that data has been sent, such a requirement could also prove to be excessive and impractical. Infrequent data transmittals such as impedance changes, ratings, etc, could easily be transmitted under cover letter. However, does this requirement also apply to each bit of real-time data transmitted via ICCP?</li> <li>2. Only one data point out of potentially thousands of points could cause non-compliance as specified in Section 5. This implies that nothing less than 100% of the data, 100% of the time is sufficient. Is this the intent of the SDT? 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.</li> <li>3. 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.</li> </ol>
<ol style="list-style-type: none"> <li>1. Several commenters agreed with your comment about 4.3.1. The standard was revised as follows: Evidence indicating data was sent to the reliability authority or evidence that the entity responsible committed to providing the data on the specification. <del>Copies of transmittal cover letters indicating data was sent to the reliability authority.</del></li> <li>2. The data specification issued by the RA under requirement 205 must identify how real time data will be supplied when there are telecommunication failures. As long as the data is supplied as specified, there is no sanction. (205.2.1.2 Specification shall address the data provision process to use when automated real-time system operating data is unavailable.)</li> <li>3. If an entity feels that the data specified by the RA is unreasonable, then that entity can try to resolve the issue with its RA or through the dispute resolution process. Both requirements 205 and 206 were modified to add a provision that if the RA is able to resolve the issue of not receiving the data it needs, then the RA does not need to notify its compliance monitor. There is only a level four non-compliance for requirement 206 if the entity does not provide the data as specified AND the entity is unable to resolve the discrepancy with its RA.</li> </ol>	
<p><u>MAAP Ops Subcommittee #2</u>          Llyod Linke MAPP          Allan Silk Manitoba Hydro          Paul Brune NPPD          Tod Gosnell Omaha Public Pwr Dist          Paul Koskela Minnesota Pwr</p>	<p>Provisions should be made to excuse the temporary loss of real-time data due to technical difficulties, such as telecommunications interruptions.</p>

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<p>Larry Larson Otter Tail Power  Derrick Moe WAPA  Dick Pursley Great River Energy  Martin Trencce Xcel Energy  Joseph Knight MAPPCOR</p>	
<p>Agreed. The data specification issued by the RA under requirement 205 must identify how real time data will be supplied when there are telecommunication failures. As long as the data is supplied as specified, there is no sanction. (205.2.1.2 Specification shall address the data provision process to use when automated real-time system operating data is unavailable.) In addition, both requirements 205 and 206 were modified to add a provision that if the RA is able to resolve the issue of not receiving the data it needs, then the RA does not need to notify its compliance monitor. There is only a level four non-compliance for requirement 206 if the entity does not provide the data as specified AND the entity is unable to resolve the discrepancy with its RA.</p>	
<p>Ed Davis Entergy Services #1</p>	<p>Please see the comment to question (2), above, concerning the TOs responsibility and role with respect to this standard. If the developers of the standard insist on only one functional entity being responsible for this activity, then that functional entity should be the Transmission Owner. However, we view this activity as a shared activity between the TO and RA. Therefore, we suggest that every occurrence of the term “reliability authority” in all of this section 206 be replaced with “reliability authority and transmission owner”.</p>
<p>The Functional Model assigns responsibility for monitoring operating reliability limits and for conducting operating reliability analyses to the Reliability Authority and these new standards must be written in a manner that supports the delineation of responsibility outlined in the Functional Model. The data being provided in this requirement is data needed to support real time monitoring and operational planning analyses and real-time assessments relative to IROLs. The Transmission Owner is not responsible for the reliability of the bulk transmission system and does not need to receive this data identified in this requirement.</p>	
<p><u>SERC Operations Planning Subcommittee</u>  Carter Edge SEPA #4, 5  William Gaither So Carolina Pub Serv Auth #1  Mike Miller Southern Co #1  Roger Brand Muni Elec Auth GA #1  Phil Creech Progress Energy – CP&amp;L #1  Gene Delk So Carolina Elec &amp; Gas #1  Al McMeekin So Carolina Elec &amp; Gas #1  Greg Ott Alcoa-Yadkin #1  Doug Newbaue GA System Operations #1  Mike Clements TVA #1  Don Reichenbach Duke Energy #1</p>	<p>Generally, the Measures should be tied to the Requirements and the Objective Evidence for Compliance (OEC) should be tied to the Measures.  Section 4.3.1 is too specific for the measure it supports. A possible solution might be:  <b>Documentation</b> indicating data was sent to the reliability authority <b>in accordance with Measure 2.1</b></p> <p>Non-compliance in data submission could take several forms and levels of impact to reliability. Section 5 should be modified as follows:  5. Levels of Non-compliance:  5.1. Level one: <b>Data was provided, but not in the mutually agreed format</b>  5.2. Level two: <b>Data was provided, but not within the time-frame specified</b></p>

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<p>Lynna Estep SERC #2 Mark Creech TVA #1</p>	<p>5.3. Level three: <b>Incomplete data was provided</b> 5.4. Level four: Data <b>was</b> not provided to the reliability authority as specified.</p>
<p>The suggested format change was not adopted. The standards have been drafted to be as succinct as possible – and the additional words do not add anything to the standard. In addition, when the standards are completed, they will be available to the industry in a relational database with search capabilities. If the suggested cross-referencing were adopted, and someone downloaded a report that listed just the compliance elements for this standard, the cross references would lead the reader to believe that additional information could be found in the measures – and in many cases this is not true.</p> <p>The result of having data supplied, but not in the agreed upon format, having data supplied late, and having incomplete data is all the same – the RA doesn't have the data it needs to support monitoring, analyses and assessments relative to IROLs for its reliability area. Both requirements 205 and 206 were modified to add a provision that if the RA is able to resolve the issue of not receiving the data it needs, then the RA does not need to notify its compliance monitor. There is only a level four non-compliance for requirement 206 if the entity does not provide the data as specified AND the entity is unable to resolve the discrepancy with its RA.</p>	
<p>Alan Johnson Mirant Americas Energy Mktg #6</p>	<p>In the requirements and measures section, would like to see language added that will be more specific as to where entities can obtain RA specifications for data provision. For example, section 1.1 could be modified to read as follows: “ Each entity performing one of the following functions shall provide data, as specified <i>in the RA's business practice manual</i>, to the reliability authority(ies) with which is has a reliability relationship.”</p> <p>Regarding the compliance monitoring process, section 4.3.1 may be inconsistent since the method of transmitting data is not specified.</p>
<p>Each RA may develop its own data specification – so including a title for RA's data specification documents is beyond the scope of this standard. The standard was drafted to give RAs flexibility – some RA's may have a data specification in a single document, while other RAs may have multiple data specifications.</p> <p>Section 4.3.1 was modified as follows. “The standard was revised as follows: Evidence indicating data was sent to the reliability authority or evidence that the entity responsible committed to providing the data on the specification. <del>Copies of transmittal cover letters indicating data was sent to the reliability authority.</del>”</p>	
<p><u>Centerpoint Energy #1</u> Richard Sikes John Jonte Wayne Kemper Glenn Hemperley Brad Calhoun</p>	<p>We believe the reliability of the real-time bulk transmission system is a coordinated effort between the Reliability Authority and Transmission Operator and the data should be provided to both functions.</p>

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<p>The Functional Model assigns responsibility for monitoring operating reliability limits and for conducting operating reliability analyses to the Reliability Authority and these new standards must be written in a manner that supports the delineation of responsibility outlined in the Functional Model. The data being provided in this requirement is data needed to support real time monitoring and operational planning analyses and real-time assessments relative to IROLs. The Transmission Operator is not responsible for the reliability of the bulk transmission system and does not need to receive all of the same data identified in this requirement. The TOP does need some of this data to monitor local network integrity, but requiring that data be provided to the TOPs is beyond the scope of this standard.</p>	
<p>Kathleen Goodman ISO-NE #2</p>	<p>Under the Section 4.3.1 “Copies of transmittal cover letters...” may not be an appropriate measure for instances of notification of missing data. For example, most of the data required is transmitted electronically from field equipment, through ICCP/SCADA, and into the EMS. Where would such “cover letters” fall in this process?</p>
<p>The compliance monitoring process was modified to broaden the scope of evidence that could be used to demonstrate compliance. As many commenters indicated, a cover letter is not sent with real-time data and it isn’t reasonable to request this. The standard was revised as follows: Evidence indicating data was sent to the reliability authority or evidence that the entity responsible committed to providing the data on the specification. <del>Copies of transmittal cover letters indicating data was sent to the reliability authority.</del></p>	

**Draft Comments and Considerations for 2<sup>nd</sup> Posting for Operate Within IROLs Standard Requirement 207 – Action Plan**

**Requirement 207 - Action Plan - Do you agree with the requirement?**

Commenter	Yes	No	Comments
Terry Bilke Midwest ISO #2	x		
Ken Githens Allegheny Energy Supply #5	x		
William Smith Allegheny Power #1	x		
Stuart Goza TVA #1	x		
<u>NPCC CP9</u> Michael Schiavone National Grid USA #1 Roger Champagne Hydro-Quebec TransEnergie #1 Ralph Rufrano New York Power Authority #1 David Little Nova Scotia Power Inc. #1 David Kiguel Hydro One Networks #1 Michael Potishnak ISO-New England #2 Barry Gee National Grid USA #1 Dan Stosick ISO-New England #2 Fernando Saavedra ISO-New England #2 Greg Campoli New York ISO #2	x		
<u>Southern Co Transmission Planning #1</u> Todd Lucas Southern Co Joe Payne Mississippi Power Company Travis Koval Southern Co Bill Pope Gulf Power Company John Clark Southern Co David Johnson Savannah Electric Mike Miller Southern Co Jim Griffith Southern Co Monroe Landrum Southern Co	x		
Peter Burke ATC #1	x		
Gerald Rheault Manitoba Hydro #1, 3, 5, 6	x		
Alan Boesch NPPD #1	x		
Dan Boezio & Raj Rana AEP #1, 3, 5, 6	x		
Raymond Mammarella PPL Elec Util #1	x		
Tom Pruitt Duke Power #1	x		
Tony Jankowski We Energies #4	x		
Michael Sidiropoulos Pacificorp	x		



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<u>Operating Reliability Working Group SPP</u> Gerry Burrows KCP&L #1 Bob Cochran SPS #1 Peter Kuebeck OG&E #1 Scott Moore AEP #1 Tom Stuchlik Westar #1 Dan Boezio AEP #1 Matt Bordelon CLECO #1 Mike Crouch WFEW #1 Mike Gammon KCP&L #1 Kevin Goolsby SPP #2 Bo Jones Westar #1 Allen Klassen Westar #1 Thad Ness AEP #1 Harold Wyble KCP&L #1 Robert Rhodes SPP #2	x		
Robert Grover PPL Elec Util #3	x		
MAAP Ops Subcommittee #2 Llyod Linke MAPP Allan Silk Manitoba Hydro Paul Brune NPPD Tod Gosnell Omaha Public Pwr Dist Paul Koskela Minnesota Pwr Larry Larson Otter Tail Power Derrick Moe WAPA Dick Pursley Great River Energy Martin Trencle Xcel Energy Joseph Knight MAPPCOR	x		
John Horakh MAAC #2	x		
BPA Adm TBL #1 James Murphy Mike Viles James Randall Al Johnson Jeff Newby Jim Gronquist Sylvia Wiggerhaus Brian Tuck	x		

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Dick Spence Tracy Rolstad Steve Hitchens			
Darrell Richardson Illinois Power #1, 3	x		
David Thorne Pepco #1	x		
<u>SERC Operations Planning Subcommittee</u> Carter Edge SEPA #4, 5 William Gaither So Carolina Pub Serv Auth #1 Mike Miller Southern Co #1 Roger Brand Muni Elec Auth GA #1 Phil Creech Progress Energy – CP&L #1 Gene Delk So Carolina Elec & Gas #1 Al McMeekin So Carolina Elec & Gas #1 Greg Ott Alcoa-Yadkin #1 Doug Newbaue GA System Operations #1 Mike Clements TVA #1 Don Reichenbach Duke Energy #1 Lynna Estep SERC #2 Mark Creech TVA #1	x		
Albert DiCaprio MAAC #2	x		
Alan Johnson Mirant Americas Energy Mktg #6	x		
Mark Heimbach PPL Generation #6	x		
<u>Trans Subcommittee</u> Robert E. Reed PJM Daniel Cooper Michigan Public Power Agency Ken Donohoo ERCOT Michael Gildea Duke-Energy, North America Francis Halpin Bonneville Power Administration Tom Mallinger Midwest ISO Darrick Moe Western Area Power Adm Scott Moore American Electric Power Bill Slater Florida Power Corporation Tom Stuchlik Western Resources Joseph Styslinger Southern Company David Thorne D. H. Thorne Consultants, Inc	x		

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Robert Waldele New York ISO Roman Carter Southern Company John Ahr Alleghany Power Systems Susan Morris SERC Ed Pfeiffer Ameren Ray Palmieri ECAR Tom Vandervort NERC			
<u>Southern Company Generation &amp; Energy Mktg</u> Roman Carter # 5, 6 Joel Dison #5,6 Tony Reed #5,6 Lucius Burris #5,6 David Deerman #5,6 Clifford Shepard #5,6 Michael Smith #5,6 Lloyd Barnes SCGEM 5,6 Gary Miller SCGEM 5,6 Terry Crawley Southern Generation 5 Roger Green Southern Generation 5	x		
<u>Centerpoint Energy #1</u> Richard Sikes John Jonte Wayne Kemper Glenn Hemperley Brad Calhoun	x	x	
Ed Davis Entergy Services #1		x	
Susan Morris SERC #2 Bill Reinke SERC #2 Sam Stryker Fayettevill PWC #3, 4, 5 Carter Edge SEPA #4, 5 Bill Thompson Dominion Trans #1		x	
<u>FRCC Op, Eng &amp; Mkt Int</u> Linda Campbell FRCC #2 Paul Elwing Lakeland Electric # 3		x	

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John Shaffer FPL #1 Bob Remley Clay Elec Coop #4 Patti Metro FRCC #2 Eirc Grant Progress Energy – FL #1 Joe Roos Ocala Electric Utility #3 Joe Krupar FL Muni Pwr Agency #3 Richard Gilbert Lakeland Electric #3 Bill Slater Progress Energy – FL #1 Amy Long Lakeland Electric #1 Roger Westphal Gainesville Regional Util #5 Bob Goss SEPA #5 Steve Wallace Seminore Electric Coop #4 Ted Hobson JEA #1			
Kathleen Goodman ISO-NE #2		x	

**Draft Comments and Considerations for 2<sup>nd</sup> Posting for Operate Within IROLs Standard Requirement 207 – Action Plan**

**Requirement 207 - Action Plan - Do you agree with the measures?**

Commenter	Yes	No	Comments
Terry Bilke Midwest ISO #2	x		
Ken Githens Allegheny Energy Supply #5	x		
William Smith Allegheny Power #1	x		
<u>NPCC CP9</u> Michael Schiavone National Grid USA #1 Roger Champagne Hydro-Quebec TransEnergie #1 Ralph Rufrano New York Power Authority #1 David Little Nova Scotia Power Inc. #1 David Kiguel Hydro One Networks #1 Michael Potishnak ISO-New England #2 Barry Gee National Grid USA #1 Dan Stosick ISO-New England #2 Fernando Saavedra ISO-New England #2 Greg Campoli New York ISO #2	x		
<u>Southern Co Transmission Planning #1</u> Todd Lucas Southern Co Joe Payne Mississippi Power Company Travis Koval Southern Co Bill Pope Gulf Power Company John Clark Southern Co David Johnson Savannah Electric Mike Miller Southern Co Jim Griffith Southern Co Monroe Landrum Southern Co	x		
Peter Burke ATC #1	x		
Gerald Rheault Manitoba Hydro #1, 3, 5, 6	x		
Alan Boesch NPPD #1	x		
Dan Boezio & Raj Rana AEP #1, 3, 5, 6	x		
Raymond Mammarella PPL Elec Util #1	x		
Tom Pruitt Duke Power #1	x		
Tony Jankowski We Energies #4	x		
Michael Sidiropoulos Pacificorp	x		

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Robert Grover PPL Elec Util #3	x		
MAAP Ops Subcommittee #2 Llyod Linke MAPP Allan Silk Manitoba Hydro Paul Brune NPPD Tod Gosnell Omaha Public Pwr Dist Paul Koskela Minnesota Pwr Larry Larson Otter Tail Power Derrick Moe WAPA Dick Pursley Great River Energy Martin Trencce Xcel Energy Joseph Knight MAPPCOR	x		
John Horakh MAAC #2	x		
BPA Adm TBL #1 James Murphy Mike Viles James Randall Al Johnson Jeff Newby Jim Gronquist Sylvia Wiggerhaus Brian Tuck	x		

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Dick Spence Tracy Rolstad Steve Hitchens			
Darrell Richardson Illinois Power #1, 3	x		
David Thorne Pepco #1	x		
Albert DiCaprio MAAC #2	x		
Alan Johnson Mirant Americas Energy Mktg #6	x		
Mark Heimbach PPL Generation #6	x		
<u>Centerpoint Energy #1</u> Richard Sikes John Jonte Wayne Kemper Glenn Hemperley Brad Calhoun	x		
<u>Southern Company Generation &amp; Energy Mktg</u> Roman Carter # 5, 6 Joel Dison #5,6 Tony Reed #5,6 Lucius Burris #5,6 David Deerman #5,6 Clifford Shepard #5,6 Michael Smith #5,6 Lloyd Barnes SCGEM 5,6 Gary Miller SCGEM 5,6 Terry Crawley Southern Generation 5 Roger Green Southern Generation 5	x		
<u>Trans Subcommittee</u> Robert E. Reed PJM Daniel Cooper Michigan Public Power Agency Ken Donohoo ERCOT Michael Gildea Duke-Energy, North America Francis Halpin Bonneville Power Administration Tom Mallinger Midwest ISO Darrick Moe Western Area Power Adm Scott Moore American Electric Power	x		

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Bill Slater Florida Power Corporation Tom Stuchlik Western Resources Joseph Styslinger Southern Company David Thorne D. H. Thorne Consultants, Inc Robert Waldele New York ISO Roman Carter Southern Company John Ahr Alleghany Power Systems Susan Morris SERC Ed Pfeiffer Ameren Ray Palmieri ECAR Tom Vandervort NERC			
Stuart Goza TVA #1		x	
Ed Davis Entergy Services #1		x	
<u>SERC Operations Planning Subcommittee</u> Carter Edge SEPA #4, 5 William Gaither So Carolina Pub Serv Auth #1 Mike Miller Southern Co #1 Roger Brand Muni Elec Auth GA #1 Phil Creech Progress Energy – CP&L #1 Gene Delk So Carolina Elec & Gas #1 Al McMeekin So Carolina Elec & Gas #1 Greg Ott Alcoa-Yadkin #1 Doug Newbaue GA System Operations #1 Mike Clements TVA #1 Don Reichenbach Duke Energy #1 Lynna Estep SERC #2 Mark Creech TVA #1		x	
Susan Morris SERC #2 Bill Reinke SERC #2 Sam Stryker Fayettevill PWC #3, 4, 5 Carter Edge SEPA #4, 5 Bill Thompson Dominion Trans #1		x	
<u>FRCC Op, Eng &amp; Mkt Int</u> Linda Campbell FRCC #2		x	



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Paul Elwing Lakeland Electric # 3 John Shaffer FPL #1 Bob Remley Clay Elec Coop #4 Patti Metro FRCC #2 Eirc Grant Progress Energy – FL #1 Joe Roos Ocala Electric Utility #3 Joe Krupar FL Muni Pwr Agency #3 Richard Gilbert Lakeland Electric #3 Bill Slater Progress Energy – FL #1 Amy Long Lakeland Electric #1 Roger Westphal Gainesville Regional Util #5 Bob Goss SEPA #5 Steve Wallace Seminore Electric Coop #4 Ted Hobson JEA #1			
Kathleen Goodman ISO-NE #2		x	

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**Requirement 207 - Action Plan - Do you agree with the compliance monitoring process?**

Commenter	Yes	No	Comments
Terry Bilke Midwest ISO #2	x		
Ken Githens Allegheny Energy Supply #5	x		
William Smith Allegheny Power #1	x		
<u>NPCC CP9</u> Michael Schiavone National Grid USA #1 Roger Champagne Hydro-Quebec TransEnergie #1 Ralph Rufrano New York Power Authority #1 David Little Nova Scotia Power Inc. #1 David Kiguel Hydro One Networks #1 Michael Potishnak ISO-New England #2 Barry Gee National Grid USA #1 Dan Stosick ISO-New England #2 Fernando Saavedra ISO-New England #2 Greg Campoli New York ISO #2	x		
<u>Southern Co Transmission Planning #1</u> Todd Lucas Southern Co Joe Payne Mississippi Power Company Travis Koval Southern Co Bill Pope Gulf Power Company John Clark Southern Co David Johnson Savannah Electric Mike Miller Southern Co Jim Griffith Southern Co Monroe Landrum Southern Co	x		
Peter Burke ATC #1	x		
Gerald Rheault Manitoba Hydro #1, 3, 5, 6	x		
Alan Boesch NPPD #1	x		
Dan Boezio & Raj Rana AEP #1, 3, 5, 6	x		
Raymond Mammarella PPL Elec Util #1	x		
Tony Jankowski We Energies #4	x		
Michael Sidiropoulos Pacificorp	x		

**Draft Comments and Considerations for 2<sup>nd</sup> Posting for Operate Within IROLs Standard Requirement 207 – Action Plan**

<u>Operating Reliability Working Group SPP</u> Gerry Burrows KCP&L #1 Bob Cochran SPS #1 Peter Kuebeck OG&E #1 Scott Moore AEP #1 Tom Stuchlik Westar #1 Dan Boezio AEP #1 Matt Bordelon CLECO #1 Mike Crouch WFEC #1 Mike Gammon KCP&L #1 Kevin Goolsby SPP #2 Bo Jones Westar #1 Allen Klassen Westar #1 Thad Ness AEP #1 Harold Wyble KCP&L #1 Robert Rhodes SPP #2	x		
Robert Grover PPL Elec Util #3	x		
MAAP Ops Subcommittee #2 Llyod Linke MAPP Allan Silk Manitoba Hydro Paul Brune NPPD Tod Gosnell Omaha Public Pwr Dist Paul Koskela Minnesota Pwr Larry Larson Otter Tail Power Derrick Moe WAPA Dick Pursley Great River Energy Martin Trencce Xcel Energy Joseph Knight MAPPCOR	x		
John Horakh MAAC #2	x		
BPA Adm TBL #1 James Murphy Mike Viles James Randall Al Johnson Jeff Newby Jim Gronquist Sylvia Wiggerhaus Brian Tuck	x		

**Draft Comments and Considerations for 2<sup>nd</sup> Posting for Operate Within IROLs Standard Requirement 207 – Action Plan**

Dick Spence Tracy Rolstad Steve Hitchens			
Darrell Richardson Illinois Power #1, 3	x		
David Thorne Pepco #1	x		
Albert DiCaprio MAAC #2	x		
Alan Johnson Mirant Americas Energy Mktg #6	x		
Mark Heimbach PPL Generation #6	x		
<u>Southern Company Generation &amp; Energy Mktg</u> Roman Carter # 5, 6 Joel Dison #5,6 Tony Reed #5,6 Lucius Burris #5,6 David Deerman #5,6 Clifford Shepard #5,6 Michael Smith #5,6 Lloyd Barnes SCGEM 5,6 Gary Miller SCGEM 5,6 Terry Crawley Southern Generation 5 Roger Green Southern Generation 5	x		
<u>Centerpoint Energy #1</u> Richard Sikes John Jonte Wayne Kemper Glenn Hemperley Brad Calhoun	x		
<u>Trans Subcommittee</u> Robert E. Reed PJM Daniel Cooper Michigan Public Power Agency Ken Donohoo ERCOT Michael Gildea Duke-Energy, North America Francis Halpin Bonneville Power Administration Tom Mallinger Midwest ISO Darrick Moe Western Area Power Adm Scott Moore American Electric Power	x		

**Draft Comments and Considerations for 2<sup>nd</sup> Posting for Operate Within IROLs Standard Requirement 207 – Action Plan**

Bill Slater Florida Power Corporation Tom Stuchlik Western Resources Joseph Styslinger Southern Company David Thorne D. H. Thorne Consultants, Inc Robert Waldele New York ISO Roman Carter Southern Company John Ahr Alleghany Power Systems Susan Morris SERC Ed Pfeiffer Ameren Ray Palmieri ECAR Tom Vandervort NERC			
Ed Davis Entergy Services #1	x		
<u>Compliance Subcommittee</u>			Change 4.1 to: The responsible entity shall demonstrate compliance to the compliance monitor within the first year that this standard becomes effective or the first year the entity commences operation by information submittal to the compliance monitor, either on or off site at the compliance monitors discretion. Add new 4.2 Subsequent to the initial compliance review, compliance will be re-verified at least every three years using a scheduled on-site review method or un-scheduled (investigation) method, review of information submitted as requested, or through self-certification, at the discretion of the compliance monitor. Re-number 4.2 and 4.3 to 4.3 and 4.4
The suggested language changes were not adopted for the following reasons: <ul style="list-style-type: none"> <li>- "Information submittal" is an undefined term. Industry commenters have asked that the compliance elements be as specific as possible so that there won't be huge variations from region to region in the application of the compliance monitoring. If an 'information submittal' is the same as a self-certification document, then this is already covered in the original language. Including language that gives each compliance monitor the flexibility to assess this requirement however it chooses, does not conform with the industry's requests for standardization in the compliance monitoring process.</li> <li>- The only significant change between the original language and the proposed new section 4.2 is the addition of the concept that the compliance monitor has the freedom to either conduct an audit per a schedule, or just show up unscheduled. Again, this does not support the industry's request for increased standardization in the compliance monitoring process. The original language included the option of conducting an 'investigation upon compliant' and this seems more appropriate than unscheduled audits.</li> </ul>			
Stuart Goza TVA #1		x	
Tom Pruitt Duke Power #1		x	
<u>SERC Operations Planning Subcommittee</u>		x	
Carter Edge SEPA #4, 5			

**Draft Comments and Considerations for 2<sup>nd</sup> Posting for Operate Within IROLs Standard Requirement 207 – Action Plan**

<p>William Gaither So Carolina Pub Serv Auth #1          Mike Miller Southern Co #1          Roger Brand Muni Elec Auth GA #1          Phil Creech Progress Energy – CP&amp;L #1          Gene Delk So Carolina Elec &amp; Gas #1          Al McMeekin So Carolina Elec &amp; Gas #1          Greg Ott Alcoa-Yadkin #1          Doug Newbaue GA System Operations #1          Mike Clements TVA #1          Don Reichenbach Duke Energy #1          Lynna Estep SERC #2          Mark Creech TVA #1</p>			
<p>Susan Morris SERC #2          Bill Reinke SERC #2          Sam Stryker Fayettevill PWC #3, 4, 5          Carter Edge SEPA #4, 5          Bill Thompson Dominion Trans #1</p>		x	
<p><u>FRCC Op, Eng &amp; Mkt Int</u>          Linda Campbell FRCC #2          Paul Elwing Lakeland Electric # 3          John Shaffer FPL #1          Bob Remley Clay Elec Coop #4          Patti Metro FRCC #2          Eirc Grant Progress Energy – FL #1          Joe Roos Ocala Electric Utility #3          Joe Krupar FL Muni Pwr Agency #3          Richard Gilbert Lakeland Electric #3          Bill Slater Progress Energy – FL #1          Amy Long Lakeland Electric #1          Roger Westphal Gainesville Regional Util #5          Bob Goss SEPA #5          Steve Wallace Seminore Electric Coop #4          Ted Hobson JEA #1</p>		x	

**Draft Comments and Considerations for 2<sup>nd</sup> Posting for Operate Within IROLs Standard Requirement 207 – Action Plan**

**Requirement 207 - Action Plan - Do you agree with the levels of non-compliance?**

Commenter	Yes	No	Comments
Terry Bilke Midwest ISO #2	x		
Ken Githens Allegheny Energy Supply #5	x		
William Smith Allegheny Power #1	x		
<u>NPCC CP9</u> Michael Schiavone National Grid USA #1 Roger Champagne Hydro-Quebec TransEnergie #1 Ralph Rufrano New York Power Authority #1 David Little Nova Scotia Power Inc. #1 David Kiguel Hydro One Networks #1 Michael Potishnak ISO-New England #2 Barry Gee National Grid USA #1 Dan Stosick ISO-New England #2 Fernando Saavedra ISO-New England #2 Greg Campoli New York ISO #2	x		
<u>Southern Co Transmission Planning #1</u> Todd Lucas Southern Co Joe Payne Mississippi Power Company Travis Koval Southern Co Bill Pope Gulf Power Company John Clark Southern Co David Johnson Savannah Electric Mike Miller Southern Co Jim Griffith Southern Co Monroe Landrum Southern Co	x		
Peter Burke ATC #1	x		
Gerald Rheault Manitoba Hydro #1, 3, 5, 6	x		
Alan Boesch NPPD #1	x		
Dan Boezio & Raj Rana AEP #1, 3, 5, 6	x		
Raymond Mammarella PPL Elec Util #1	x		
Tom Pruitt Duke Power #1	x		
Tony Jankowski We Energies #4	x		
Michael Sidiropoulos Pacificorp	x		

**Draft Comments and Considerations for 2<sup>nd</sup> Posting for Operate Within IROLs Standard Requirement 207 – Action Plan**

<u>Operating Reliability Working Group SPP</u> Gerry Burrows KCP&L #1 Bob Cochran SPS #1 Peter Kuebeck OG&E #1 Scott Moore AEP #1 Tom Stuchlik Westar #1 Dan Boezio AEP #1 Matt Bordelon CLECO #1 Mike Crouch WFEC #1 Mike Gammon KCP&L #1 Kevin Goolsby SPP #2 Bo Jones Westar #1 Allen Klassen Westar #1 Thad Ness AEP #1 Harold Wyble KCP&L #1 Robert Rhodes SPP #2	x		
Robert Grover PPL Elec Util #3	x		
MAAP Ops Subcommittee #2 Llyod Linke MAPP Allan Silk Manitoba Hydro Paul Brune NPPD Tod Gosnell Omaha Public Pwr Dist Paul Koskela Minnesota Pwr Larry Larson Otter Tail Power Derrick Moe WAPA Dick Pursley Great River Energy Martin Trencce Xcel Energy Joseph Knight MAPPCOR	x		
John Horakh MAAC #2	x		
BPA Adm TBL #1 James Murphy Mike Viles James Randall Al Johnson Jeff Newby Jim Gronquist Sylvia Wiggerhaus Brian Tuck	x		



**Draft Comments and Considerations for 2<sup>nd</sup> Posting for Operate Within IROLs Standard Requirement 207 – Action Plan**

Dick Spence Tracy Rolstad Steve Hitchens			
Darrell Richardson Illinois Power #1, 3	x		
David Thorne Pepco #1	x		
Ed Davis Entergy Services #1	x		
Albert DiCaprio MAAC #2	x		
Alan Johnson Mirant Americas Energy Mktg #6	x		
Mark Heimbach PPL Generation #6	x		
<u>Centerpoint Energy #1</u> Richard Sikes John Jonte Wayne Kemper Glenn Hemperley Brad Calhoun	x		
<u>Southern Company Generation &amp; Energy Mktg</u> Roman Carter # 5, 6 Joel Dison #5,6 Tony Reed #5,6 Lucius Burris #5,6 David Deerman #5,6 Clifford Shepard #5,6 Michael Smith #5,6 Lloyd Barnes SCGEM 5,6 Gary Miller SCGEM 5,6 Terry Crawley Southern Generation 5 Roger Green Southern Generation 5	x		
Susan Morris SERC #2 Bill Reinke SERC #2 Sam Stryker Fayettevill PWC #3, 4, 5 Carter Edge SEPA #4, 5 Bill Thompson Dominion Trans #1		x	
Stuart Goza TVA #1		x	
<u>SERC Operations Planning Subcommittee</u>		x	

**Draft Comments and Considerations for 2<sup>nd</sup> Posting for Operate Within IROLs Standard Requirement 207 – Action Plan**

<p>Carter Edge SEPA #4, 5          William Gaither So Carolina Pub Serv Auth #1          Mike Miller Southern Co #1          Roger Brand Muni Elec Auth GA #1          Phil Creech Progress Energy – CP&amp;L #1          Gene Delk So Carolina Elec &amp; Gas #1          Al McMeekin So Carolina Elec &amp; Gas #1          Greg Ott Alcoa-Yadkin #1          Doug Newbaue GA System Operations #1          Mike Clements TVA #1          Don Reichenbach Duke Energy #1          Lynna Estep SERC #2          Mark Creech TVA #1</p>			
<p>FRCC Op, Eng &amp; Mkt Int          Linda Campbell FRCC #2          Paul Elwing Lakeland Electric # 3          John Shaffer FPL #1          Bob Remley Clay Elec Coop #4          Patti Metro FRCC #2          Eirc Grant Progress Energy – FL #1          Joe Roos Ocala Electric Utility #3          Joe Krupar FL Muni Pwr Agency #3          Richard Gilbert Lakeland Electric #3          Bill Slater Progress Energy – FL #1          Amy Long Lakeland Electric #1          Roger Westphal Gainesville Regional Util #5          Bob Goss SEPA #5          Steve Wallace Seminore Electric Coop #4          Ted Hobson JEA #1</p>		x	
<p>Kathleen Goodman ISO-NE #2</p>		x	

**Draft Comments and Considerations for 2<sup>nd</sup> Posting for Operate Within IROLs Standard Requirement 207 – Action Plan**

**Requirement 207 - Action Plan – Other comments?**

**Summary Consideration:** While there were many comments recommending specific changes, most commenters indicated support of the requirement, its measures and compliance elements. The following changes were made:

- Measure 2.1 was modified to indicate that the Action Plan must 'identify' as well as be coordinated with entities that take actions and with entities that are affected by such actions.

The Performance Reset period was modified to include the following language: "12 months from the last violation"

Suggestions to change the format of the compliance so that it cross referenced measures (e.g., ". . .as described in measure 2.1") and were not adopted. When the standards are entered into a relational database and reports are generated, cross-references will be difficult to understand.

The SDT was unable to accommodate the changes recommending that Transmission Owner and Transmission Operator be added to the list of functions that must develop Action Plans. The Functional Model assigns responsibility for reliability of the transmission system to the Reliability Authority, and these new standards are being developed to support the delineation of responsibility outlined in the Functional Model.

Commenter	Comments
Terry Bilke Midwest ISO #2	How do you demonstrate coordination of an action plan?
The compliance manager could contact the entities listed in the plan and ask them if they were invited to participate in the development of the plan.	
Stuart Goza TVA #1  <u>SERC Operations Planning Subcommittee</u> Carter Edge SEPA #4, 5 William Gaither So Carolina Pub Serv Auth #1 Mike Miller Southern Co #1 Roger Brand Muni Elec Auth GA #1 Phil Creech Progress Energy – CP&L #1 Gene Delk So Carolina Elec & Gas #1 Al McMeekin So Carolina Elec & Gas #1 Greg Ott Alcoa-Yadkin #1 Doug Newbaue GA System Operations #1 Mike Clements TVA #1 Don Reichenbach Duke Energy #1 Lynna Estep SERC #2 Mark Creech TVA #1	Generally, the Measures should be tied to the Requirements and the Objective Evidence for Compliance (OEC) should be tied to the Measures. The Levels of non-compliance should be objectively determined based on the evidence.  Measure 2.1 should be modified to include:  2.1. The reliability authority shall have a documented action plan that addresses preventing and mitigating instances of exceeding interconnection reliability operating limits. The plan shall <b>identify and</b> be coordinated with those entities responsible for acting and with those entities impacted by such actions.  Section 4.3 should be modified to include: 4.3. The reliability authority shall make the following available for inspection by the compliance monitor upon request:  4.3.1 Action plan <b>developed in accordance with Measure 2.1</b>  Section 5 should be modified to include: 5. Levels of Non-compliance 5.1. Level one: Action plan exists but wasn't coordinated with all involved

**Draft Comments and Considerations for 2<sup>nd</sup> Posting for Operate Within IROLs Standard Requirement 207 – Action Plan**

<p>Susan Morris SERC #2          Bill Reinke SERC #2          Sam Stryker Fayettevill PWC #3, 4, 5          Carter Edge SEPA #4, 5          Bill Thompson Dominion Trans #1</p>	<p>and impacted entities</p> <p>5.2. Level two: Action plan exists but wasn't coordinated with any involved or any impacted entities</p> <p>5.3. Level three: <b>Action plan is incomplete</b></p> <p>5.4. Level four: No action plan</p>
<p>The suggested format change was not adopted. The standards have been drafted to be as succinct as possible – and the additional words do not add anything to the standard. In addition, when the standards are completed, they will be available to the industry in a relational database with search capabilities. If the suggested cross-referencing were adopted, and someone downloaded a report that listed just the compliance elements for this standard, the cross references would lead the reader to believe that additional information could be found in the measures – and in many cases this is not true.</p> <p>The suggestion to add, 'and identify' was adopted and is reflected in the revised standard.          The suggestion to add, "action plan incomplete" for a level three non-compliance was not added because this would be difficult to objectively measure.</p>	
<p>NPCC CP9          Michael Schiavone National Grid USA #1          Roger Champagne Hydro-Quebec TransEnergie #1          Ralph Rufrano New York Power Authority #1          David Little Nova Scotia Power Inc. #1          David Kiguel Hydro One Networks #1          Michael Potishnak ISO-New England #2          Barry Gee National Grid USA #1          Dan Stosick ISO-New England #2          Fernando Saavedra ISO-New England #2          Greg Campoli New York ISO #2</p>	<p>NPCC suggests that there be timeframe requirement added instead of "upon request" to providing the Action plan and suggests 20 business days.</p>
<p>If the plan exists, there should not be a need to have 20 business days to show the plan. This suggestion was not adopted since it could have the affect of encouraging non-compliant performance.</p>	
<p>Charles Yeung Reliant #5</p>	<p>The requirement is silent on whether the Action Plan must comply with any tariff or market requirements. As written, it is allowable for an RA to submit a "command and control" schedule reduction or load-shedding procedure as its Action Plan to meet this Requirement. Reliant understands that NERC believes such Action Plans have significant commercial consequences and should be developed by other standard setting organizations. However, without the RA and control area operators' agreement that such Action Plans are effective, the industry effort to develop such plans will be slow and cumbersome. Reliant recommends that this SDT coordinate with the appropriate standards setting organization(s) to ensure the Action Plans are effective. Further, this Requirement should include a requirement that these Action Plans are the</p>

**Draft Comments and Considerations for 2<sup>nd</sup> Posting for Operate Within IROLs Standard Requirement 207 – Action Plan**

	primary means of mitigating Reliability Operating Limit violations and not a “command and control” or “Emergency” procedure.
<p>NERC’s reliability standards are being developed to support reliability and making specific references to tariffs and market issues is outside the scope of these new standards. However, the standards are being developed in a manner that should protect the markets. This standard includes the following specific language that was intended to ensure that entities impacted by an Action Plan would have an opportunity to participate in the development of the plan: “The plan shall identify and be coordinated with those entities responsible for acting and with those entities impacted by such actions. “</p> <p>Action Plans are intended to be unique to each RA, not generic to the industry. The SDT does not have a role in developing the individual RA’s Action Plans, and therefore the SDT has no role in coordinating the development of these action plans with other standards-setting organizations.</p> <p>Language in the standard specifically states that if an existing ‘emergency procedure’ addresses the prevention and mitigation of IROLs, then that procedure could be used to meet this requirement. The intent is to ensure that RAs are not forced to revise existing documents that already address this requirement.</p>	
<p>Susan Morris SERC #2          Bill Reinke SERC #2          Sam Stryker Fayettevill PWC #3, 4, 5          Carter Edge SEPA #4, 5          Bill Thompson Dominion Trans #1          Ed Davis Entergy Services #1</p>	<p>Please see the comment to question (2), above, concerning the TOs responsibility and role with respect to this standard. If the developers of the standard insist on only one functional entity being responsible for this activity, then that functional entity should be the Transmission Owner. However, we view this activity as a shared activity between the TO(s) and RA. Therefore, we suggest that every occurrence of the term “reliability authority” in all of this section 207 be replaced with “reliability authority and transmission owner(s)”.</p>
<p>The Functional Model assigns responsibility for reliability of the bulk transmission system to the Reliability Authority and these new standards must be written in a manner that supports the delineation of responsibility outlined in the Functional Model. The Transmission Owner is not responsible for the reliability of the bulk transmission system.</p>	
<p><u>FRCC Op, Eng &amp; Mkt Int</u>          Linda Campbell FRCC #2          Paul Elwing Lakeland Electric #3          John Shaffer FPL #1          Bob Remley Clay Elec Coop #4          Patti Metro FRCC #2          Eirc Grant Progress Energy – FL #1          Joe Roos Ocala Electric Utility #3          Joe Krupar FL Muni Pwr Agency #3          Richard Gilbert Lakeland Electric #3          Bill Slater Progress Energy – FL #1          Amy Long Lakeland Electric #1</p>	<p>We are not convinced that this requirement is needed. The requirements in 204 (Actions) seem to already cover this area. There could be many actions to take to prevent or mitigate instances of exceeding IROLs, so it could be extremely burdensome to document every conceivable action. Truly the proof is in the 204 requirement so we would suggest deleting this one.</p>

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Roger Westphal Gainesville Regional Util #5 Bob Goss SEPA #5 Steve Wallace Seminore Electric Coop #4 Ted Hobson JEA #1	
Most industry commenters supported the inclusion of this requirement, so it was not dropped from the standard.	
Dan Boezio & Raj Rana AEP #1, 3, 5, 6	Defined terms should be capitalized, such as “Reliability Authority”, “Operational Planning Analyses”, “Interconnected Reliability Operating Limits”, etc
The suggestion that defined terms be capitalized has been adopted and is reflected in the revised standard.	
Tom Pruitt Duke Power #1	For consistency with previous sections, replace the first sentence in section 207.4.2 with “The performance-reset period shall be one calendar year.”
There were several commenters who suggested changes to the reset period, and the standard was revised so that all requirements in this standard have the following language: “12 months from the last violation” This change supports your recommendation.	
Alan Johnson Mirant Americas Energy Mktg #6	Suggest adding a requirement that the RA notify those entities impacted by the action plan, of their responsibilities within the action plan. This will enable them to incorporate the required actions into their own operating plans.
The standard requires that those impacted be involved in the development of the plan. The requirement includes the following language intended to ensure that those impacted would have some involvement in the development of the Action Plan. “The plan shall identify and be coordinated with those entities responsible for acting and with those entities impacted by such actions.”	
<u>Centerpoint Energy #1</u> Richard Sikes John Jonte Wayne Kemper Glenn Hemperley Brad Calhoun	We believe that for an action plan to mitigate events it must be coordinated between involved parties, i.e. Reliability Authorities and Transmission Operators.
The standard includes language to support this: “The plan shall identify and be coordinated with those entities responsible for acting and with those entities impacted by such actions.” If the TOP is responsible for taking actions, then the TOP is required to be involved in the development of the plan.	
Kathleen Goodman ISO-NE #2	ISO-NE again suggests that provisions be made for mitigating actions which were not previously identified by study, but cleared the limit violation. If these provisions are not included, it may restrict the actions that may be taken and, ultimately, adversely impact reliability (i.e. there may be actions that can be taken in real-time, given an existing network configuration which was not envisioned at the time the operational analysis was done; however, if NERC Standards mandate that an action plan be followed, these

**Draft Comments and Considerations for 2<sup>nd</sup> Posting for Operate Within IROLs Standard Requirement 207 – Action Plan**

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	<p>actions may not be taken or seriously considered).</p> <p>All data retention requirements of three years should be modified to a 12-month rolling retention.</p>
<p>This requirement states, “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.” The intent is to ensure that the RA’s system operators have a plan to follow in advance of being faced with an IROL event. Note that, for the reasons you’ve stated, this standard does not require that the RA’s system operators follow the Action Plan. The drafting team feels that any action taken, whether part of a plan or not, or any deliberate decision to take no action, meets the standard. The decision to not take any action must show up in the documentation.</p> <p>This standard requires keeping the data for just 3 years to ensure that there is some data on site when the Compliance Monitor conducts a scheduled audit once every 3 years.</p>	

**Draft Comments and Considerations for 2<sup>nd</sup> Posting for Operate Within IROLs Standard Requirement 208 – RA Directives**

**Requirement 208 – Reliability Authority Directives - Do you agree with the requirement?**

Commenter	Yes	No	Comments
Kathleen Goodman ISO-NE #2	x		
Terry Bilke Midwest ISO #2	x		
Ken Githens Allegheny Energy Supply #5	x		
William Smith Allegheny Power #1	x		
Stuart Goza TVA #1	x		
<u>NPCC CP9</u> Michael Schiavone National Grid USA #1 Roger Champagne Hydro-Quebec TransEnergie #1 Ralph Rufrano New York Power Authority #1 David Little Nova Scotia Power Inc. #1 David Kiguel Hydro One Networks #1 Michael Potishnak ISO-New England #2 Barry Gee National Grid USA #1 Dan Stosick ISO-New England #2 Fernando Saavedra ISO-New England #2 Greg Campoli New York ISO #2	x		
<u>Southern Co Transmission Planning #1</u> Todd Lucas Southern Co Joe Payne Mississippi Power Company Travis Koval Southern Co Bill Pope Gulf Power Company John Clark Southern Co David Johnson Savannah Electric Mike Miller Southern Co Jim Griffith Southern Co Monroe Landrum Southern Co	x		
Peter Burke ATC #1	x		
Gerald Rheault Manitoba Hydro #1, 3, 5, 6	x		
<u>FRCC Op, Eng &amp; Mkt Int</u> Linda Campbell FRCC #2 Paul Elwing Lakeland Electric # 3 John Shaffer FPL #1 Bob Remley Clay Elec Coop #4	x		



**Draft Comments and Considerations for 2<sup>nd</sup> Posting for Operate Within IROLs Standard Requirement 208 – RA Directives**

Patti Metro FRCC #2 Eirc Grant Progress Energy – FL #1 Joe Roos Ocala Electric Utility #3 Joe Krupar FL Muni Pwr Agency #3 Richard Gilbert Lakeland Electric #3 Bill Slater Progress Energy – FL #1 Amy Long Lakeland Electric #1 Roger Westphal Gainesville Regional Util #5 Bob Goss SEPA #5 Steve Wallace Seminore Electric Coop #4 Ted Hobson JEA #1			
Raymond Mammarella PPL Elec Util #1	x		
Tom Pruitt Duke Power #1	x		
Robert Grover PPL Elec Util #3	x		
<u>Southern Co Transmission Planning</u> Todd Lucas Southern Co #1 Joe Payne Mississippi Pwr Co #3 Travis Koval Southern Co #1 Bill Pope Gulf Pwr Co #3 John Clark Southern Co #1 David Johnson Savannah Electric #3	x		
John Horakh MAAC #2	x		
<u>BPA Adm TBL #1</u> James Murphy Mike Viles James Randall Al Johnson Jeff Newby Jim Gronquist Sylvia Wiggerhaus Brian Tuck Dick Spence Tracy Rolstad Steve Hitchens	x		
Darrell Richardson Illinois Power #1, 3	x		
David Thorne Pepco #1	x		
<u>SERC Operations Planning Subcommittee</u> Carter Edge SEPA #4, 5 William Gaither So Carolina Pub Serv Auth #1	x		

**Draft Comments and Considerations for 2<sup>nd</sup> Posting for Operate Within IROLs Standard Requirement 208 – RA Directives**

Mike Miller Southern Co #1 Roger Brand Muni Elec Auth GA #1 Phil Creech Progress Energy – CP&L #1 Gene Delk So Carolina Elec & Gas #1 Al McMeekin So Carolina Elec & Gas #1 Greg Ott Alcoa-Yadkin #1 Doug Newbaue GA System Operations #1 Mike Clements TVA #1 Don Reichenbach Duke Energy #1 Lynna Estep SERC #2 Mark Creech TVA #1			
Albert DiCaprio MAAC #2	x		
Mark Heimbach PPL Generation #6	x		
<u>Centerpoint Energy #1</u> Richard Sikes John Jonte Wayne Kemper Glenn Hemperley Brad Calhoun	x		
<u>Trans Subcommittee</u> Robert E. Reed PJM Daniel Cooper Michigan Public Power Agency Ken Donohoo ERCOT Michael Gildea Duke-Energy, North America Francis Halpin Bonneville Power Administration Tom Mallinger Midwest ISO Darrick Moe Western Area Power Adm Scott Moore American Electric Power Bill Slater Florida Power Corporation Tom Stuchlik Western Resources Joseph Styslinger Southern Company David Thorne D. H. Thorne Consultants, Inc Robert Waldele New York ISO Roman Carter Southern Company	x		

**Draft Comments and Considerations for 2<sup>nd</sup> Posting for Operate Within IROLs Standard Requirement 208 – RA Directives**

John Ahr Alleghany Power Systems Susan Morris SERC Ed Pfeiffer Ameren Ray Palmieri ECAR Tom Vandervort NERC			
<u>Southern Company Generation &amp; Energy Mktg</u> Roman Carter # 5, 6 Joel Dison #5,6 Tony Reed #5,6 Lucius Burris #5,6 David Deerman #5,6 Clifford Shepard #5,6 Michael Smith #5,6 Lloyd Barnes SCGEM 5,6 Gary Miller SCGEM 5,6 Terry Crawley Southern Generation 5 Roger Green Southern Generation 5	x		
Ed Davis Entergy Services #1		x	
Charles Yeung Reliant #5		x	
Susan Morris SERC #2 Bill Reinke SERC #2 Sam Stryker Fayettevill PWC #3, 4, 5 Carter Edge SEPA #4, 5 Bill Thompson Dominion Trans #1		x	
Alan Boesch NPPD #1		x	
Dan Boezio & Raj Rana AEP #1, 3, 5, 6		x	
Michael Sidiropoulos Pacificorp		x	
Alan Johnson Mirant Americas Energy Mktg #6		x	

**Draft Comments and Considerations for 2<sup>nd</sup> Posting for Operate Within IROLs Standard Requirement 208 – RA Directives**

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<u>Operating Reliability Working Group SPP</u> Gerry Burrows KCP&L #1 Bob Cochran SPS #1 Peter Kuebeck OG&E #1 Scott Moore AEP #1 Tom Stuchlik Westar #1 Dan Boezio AEP #1 Matt Bordelon CLECO #1 Mike Crouch WFEC #1 Mike Gammon KCP&L #1 Kevin Goolsby SPP #2 Bo Jones Westar #1 Allen Klassen Westar #1 Thad Ness AEP #1 Harold Wyble KCP&L #1 Robert Rhodes SPP #2		x	
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**Draft Comments and Considerations for 2<sup>nd</sup> Posting for Operate Within IROLs Standard Requirement 208 – RA Directives**

**Requirement 208 – Reliability Authority Directives - Do you agree with the measures?**

Commenter	Yes	No	Comments
Kathleen Goodman ISO-NE #2	x		
Ken Githens Allegheny Energy Supply #5	x		
William Smith Allegheny Power #1	x		
Stuart Goza TVA #1	x		
<u>NPCC CP9</u> Michael Schiavone National Grid USA #1 Roger Champagne Hydro-Quebec TransEnergie #1 Ralph Rufrano New York Power Authority #1 David Little Nova Scotia Power Inc. #1 David Kiguel Hydro One Networks #1 Michael Potishnak ISO-New England #2 Barry Gee National Grid USA #1 Dan Stosick ISO-New England #2 Fernando Saavedra ISO-New England #2 Greg Campoli New York ISO #2	x		
<u>Southern Co Transmission Planning #1</u> Todd Lucas Southern Co Joe Payne Mississippi Power Company Travis Koval Southern Co Bill Pope Gulf Power Company John Clark Southern Co David Johnson Savannah Electric Mike Miller Southern Co Jim Griffith Southern Co Monroe Landrum Southern Co	x		
Peter Burke ATC #1	x		
Gerald Rheault Manitoba Hydro #1, 3, 5, 6	x		
<u>FRCC Op, Eng &amp; Mkt Int</u> Linda Campbell FRCC #2 Paul Elwing Lakeland Electric # 3 John Shaffer FPL #1 Bob Remley Clay Elec Coop #4 Patti Metro FRCC #2	x		

**Draft Comments and Considerations for 2<sup>nd</sup> Posting for Operate Within IROLs Standard Requirement 208 – RA Directives**

Eirc Grant Progress Energy – FL #1 Joe Roos Ocala Electric Utility #3 Joe Krupar FL Muni Pwr Agency #3 Richard Gilbert Lakeland Electric #3 Bill Slater Progress Energy – FL #1 Amy Long Lakeland Electric #1 Roger Westphal Gainesville Regional Util #5 Bob Goss SEPA #5 Steve Wallace Seminore Electric Coop #4 Ted Hobson JEA #1			
Raymond Mammarella PPL Elec Util #1	x		
Tom Pruitt Duke Power #1	x		
Michael Sidiropoulos Pacificorp	x		
Robert Grover PPL Elec Util #3	x		
<u>Southern Co Transmission Planning</u> Todd Lucas Southern Co #1 Joe Payne Mississippi Pwr Co #3 Travis Koval Southern Co #1 Bill Pope Gulf Pwr Co #3 John Clark Southern Co #1 David Johnson Savannah Electric #3	x		
John Horakh MAAC #2	x		
<u>BPA Adm TBL #1</u> James Murphy Mike Viles James Randall Al Johnson Jeff Newby Jim Gronquist Sylvia Wiggerhaus Brian Tuck Dick Spence Tracy Rolstad Steve Hitchens	x		
Darrell Richardson Illinois Power #1, 3	x		
David Thorne Pepco #1	x		
Ed Davis Entergy Services #1	x		
<u>SERC Operations Planning Subcommittee</u>	x		

**Draft Comments and Considerations for 2<sup>nd</sup> Posting for Operate Within IROLs Standard Requirement 208 – RA Directives**

Carter Edge SEPA #4, 5 William Gaither So Carolina Pub Serv Auth #1 Mike Miller Southern Co #1 Roger Brand Muni Elec Auth GA #1 Phil Creech Progress Energy – CP&L #1 Gene Delk So Carolina Elec & Gas #1 Al McMeekin So Carolina Elec & Gas #1 Greg Ott Alcoa-Yadkin #1 Doug Newbaue GA System Operations #1 Mike Clements TVA #1 Don Reichenbach Duke Energy #1 Lynna Estep SERC #2 Mark Creech TVA #1			
Albert DiCaprio MAAC #2	x		
Alan Johnson Mirant Americas Energy Mktg #6	x		
Mark Heimbach PPL Generation #6	x		
<u>Centerpoint Energy #1</u> Richard Sikes John Jonte Wayne Kemper Glenn Hemperley Brad Calhoun	x		
<u>Trans Subcommittee</u> Robert E. Reed PJM Daniel Cooper Michigan Public Power Agency Ken Donohoo ERCOT Michael Gildea Duke-Energy, North America Francis Halpin Bonneville Power Administration Tom Mallinger Midwest ISO Darrick Moe Western Area Power Adm Scott Moore American Electric Power Bill Slater Florida Power Corporation Tom Stuchlik Western Resources Joseph Styslinger Southern Company	x		

**Draft Comments and Considerations for 2<sup>nd</sup> Posting for Operate Within IROLs Standard Requirement 208 – RA Directives**

David Thorne D. H. Thorne Consultants, Inc Robert Waldele New York ISO Roman Carter Southern Company John Ahr Alleghany Power Systems Susan Morris SERC Ed Pfeiffer Ameren Ray Palmieri ECAR Tom Vandervort NERC			
<u>Southern Company Generation &amp; Energy Mktg</u> Roman Carter # 5, 6 Joel Dison #5,6 Tony Reed #5,6 Lucius Burris #5,6 David Deerman #5,6 Clifford Shepard #5,6 Michael Smith #5,6 Lloyd Barnes SCGEM 5,6 Gary Miller SCGEM 5,6 Terry Crawley Southern Generation 5 Roger Green Southern Generation 5	x		
Terry Bilke Midwest ISO #2		x	
Alan Boesch NPPD #1		x	
Dan Boezio & Raj Rana AEP #1, 3, 5, 6		x	
Charles Yeung Reliant #5		x	
Susan Morris SERC #2 Bill Reinke SERC #2 Sam Stryker Fayettevill PWC #3, 4, 5 Carter Edge SEPA #4, 5 Bill Thompson Dominion Trans #1		x	



**Draft Comments and Considerations for 2<sup>nd</sup> Posting for Operate Within IROLs Standard Requirement 208 – RA Directives**

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<u>Operating Reliability Working Group SPP</u> Gerry Burrows KCP&L #1 Bob Cochran SPS #1 Peter Kuebeck OG&E #1 Scott Moore AEP #1 Tom Stuchlik Westar #1 Dan Boezio AEP #1 Matt Bordelon CLECO #1 Mike Crouch WFEC #1 Mike Gammon KCP&L #1 Kevin Goolsby SPP #2 Bo Jones Westar #1 Allen Klassen Westar #1 Thad Ness AEP #1 Harold Wyble KCP&L #1 Robert Rhodes SPP #2		x	
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**Draft Comments and Considerations for 2<sup>nd</sup> Posting for Operate Within IROLs Standard Requirement 208 – RA Directives**

**Requirement 208 – Reliability Authority Directives - Do you agree with the compliance monitoring process?**

Commenter	Yes	No	Comments
Kathleen Goodman ISO-NE #2	x		
Terry Bilke Midwest ISO #2	x		
Ken Githens Allegheny Energy Supply #5	x		
<u>Compliance Subcommittee</u>			OK
William Smith Allegheny Power #1	x		
<u>NPCC CP9</u> Michael Schiavone National Grid USA #1 Roger Champagne Hydro-Quebec TransEnergie #1 Ralph Rufrano New York Power Authority #1 David Little Nova Scotia Power Inc. #1 David Kiguel Hydro One Networks #1 Michael Potishnak ISO-New England #2 Barry Gee National Grid USA #1 Dan Stosick ISO-New England #2 Fernando Saavedra ISO-New England #2 Greg Campoli New York ISO #2	x		
<u>Southern Co Transmission Planning #1</u> Todd Lucas Southern Co Joe Payne Mississippi Power Company Travis Koval Southern Co Bill Pope Gulf Power Company John Clark Southern Co David Johnson Savannah Electric Mike Miller Southern Co Jim Griffith Southern Co Monroe Landrum Southern Co	x		
Peter Burke ATC #1	x		
Gerald Rheault Manitoba Hydro #1, 3, 5, 6	x		
Dan Boezio & Raj Rana AEP #1, 3, 5, 6	x		
Raymond Mammarella PPL Elec Util #1	x		
Tom Pruitt Duke Power #1	x		
Michael Sidiropoulos Pacificorp	x		

**Draft Comments and Considerations for 2<sup>nd</sup> Posting for Operate Within IROLs Standard Requirement 208 – RA Directives**

<u>Operating Reliability Working Group SPP</u> Gerry Burrows KCP&L #1 Bob Cochran SPS #1 Peter Kuebeck OG&E #1 Scott Moore AEP #1 Tom Stuchlik Westar #1 Dan Boezio AEP #1 Matt Bordelon CLECO #1 Mike Crouch WFEC #1 Mike Gammon KCP&L #1 Kevin Goolsby SPP #2 Bo Jones Westar #1 Allen Klassen Westar #1 Thad Ness AEP #1 Harold Wyble KCP&L #1 Robert Rhodes SPP #2	x		
Robert Grover PPL Elec Util #3	x		
John Horakh MAAC #2	x		
<u>BPA Adm TBL #1</u> James Murphy Mike Viles James Randall Al Johnson Jeff Newby Jim Gronquist Sylvia Wiggerhaus Brian Tuck Dick Spence Tracy Rolstad Steve Hitchens	x		
Darrell Richardson Illinois Power #1, 3	x		
David Thorne Pepco #1	x		
Ed Davis Entergy Services #1	x		
Albert DiCaprio MAAC #2	x		
Alan Johnson Mirant Americas Energy Mktg #6	x		
Mark Heimbach PPL Generation #6	x		
<u>Centerpoint Energy #1</u> Richard Sikes	x		

**Draft Comments and Considerations for 2<sup>nd</sup> Posting for Operate Within IROLs Standard Requirement 208 – RA Directives**

John Jonte Wayne Kemper Glenn Hemperley Brad Calhoun			
<u>Trans Subcommittee</u> Robert E. Reed PJM Daniel Cooper Michigan Public Power Agency Ken Donohoo ERCOT Michael Gildea Duke-Energy, North America Francis Halpin Bonneville Power Administration Tom Mallinger Midwest ISO Darrick Moe Western Area Power Adm Scott Moore American Electric Power Bill Slater Florida Power Corporation Tom Stuchlik Western Resources Joseph Styslinger Southern Company David Thorne D. H. Thorne Consultants, Inc Robert Waldele New York ISO Roman Carter Southern Company John Ahr Alleghany Power Systems Susan Morris SERC Ed Pfeiffer Ameren Ray Palmieri ECAR Tom Vandervort NERC	x		

**Draft Comments and Considerations for 2<sup>nd</sup> Posting for Operate Within IROLs Standard Requirement 208 – RA Directives**

<u>Southern Company Generation &amp; Energy Mktg</u> Roman Carter # 5, 6 Joel Dison #5,6 Tony Reed #5,6 Lucius Burris #5,6 David Deerman #5,6 Clifford Shepard #5,6 Michael Smith #5,6 Lloyd Barnes SCGEM 5,6 Gary Miller SCGEM 5,6 Terry Crawley Southern Generation 5 Roger Green Southern Generation 5	x		
Alan Boesch NPPD #1		x	
<u>SERC Operations Planning Subcommittee</u> Carter Edge SEPA #4, 5 William Gaither So Carolina Pub Serv Auth #1 Mike Miller Southern Co #1 Roger Brand Muni Elec Auth GA #1 Phil Creech Progress Energy – CP&L #1 Gene Delk So Carolina Elec & Gas #1 Al McMeekin So Carolina Elec & Gas #1 Greg Ott Alcoa-Yadkin #1 Doug Newbaue GA System Operations #1 Mike Clements TVA #1 Don Reichenbach Duke Energy #1 Lynna Estep SERC #2 Mark Creech TVA #1		x	
Charles Yeung Reliant #5		x	
Stuart Goza TVA #1		x	
Susan Morris SERC #2 Bill Reinke SERC #2 Sam Stryker Fayettevill PWC #3, 4, 5 Carter Edge SEPA #4, 5 Bill Thompson Dominion Trans #1		x	

**Draft Comments and Considerations for 2<sup>nd</sup> Posting for Operate Within IROLs Standard Requirement 208 – RA Directives**

<p><u>FRCC Op, Eng &amp; Mkt Int</u>  Linda Campbell FRCC #2  Paul Elwing Lakeland Electric # 3  John Shaffer FPL #1  Bob Remley Clay Elec Coop #4  Patti Metro FRCC #2  Eirc Grant Progress Energy – FL #1  Joe Roos Ocala Electric Utility #3  Joe Krupar FL Muni Pwr Agency #3  Richard Gilbert Lakeland Electric #3  Bill Slater Progress Energy – FL #1  Amy Long Lakeland Electric #1  Roger Westphal Gainesville Regional Util #5  Bob Goss SEPA #5  Steve Wallace Seminore Electric Coop #4  Ted Hobson JEA #1</p>		<p>x</p>	
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**Draft Comments and Considerations for 2<sup>nd</sup> Posting for Operate Within IROLs Standard Requirement 208 – RA Directives**

**Requirement 208 – Reliability Authority Directives - Do you agree with the levels of non-compliance?**

Commenter	Yes	No	Comments
Kathleen Goodman ISO-NE #2	x		
Terry Bilke Midwest ISO #2	x		
Ken Githens Allegheny Energy Supply #5	x		
William Smith Allegheny Power #1	x		
<u>NPCC CP9</u> Michael Schiavone National Grid USA #1 Roger Champagne Hydro-Quebec TransEnergie #1 Ralph Rufrano New York Power Authority #1 David Little Nova Scotia Power Inc. #1 David Kiguel Hydro One Networks #1 Michael Potishnak ISO-New England #2 Barry Gee National Grid USA #1 Dan Stosick ISO-New England #2 Fernando Saavedra ISO-New England #2 Greg Campoli New York ISO #2	x		
<u>Southern Co Transmission Planning #1</u> Todd Lucas Southern Co Joe Payne Mississippi Power Company Travis Koval Southern Co Bill Pope Gulf Power Company John Clark Southern Co David Johnson Savannah Electric Mike Miller Southern Co Jim Griffith Southern Co Monroe Landrum Southern Co	x		
Peter Burke ATC #1	x		
Gerald Rheault Manitoba Hydro #1, 3, 5, 6	x		
Dan Boezio & Raj Rana AEP #1, 3, 5, 6	x		
Raymond Mammarella PPL Elec Util #1	x		
Michael Sidiropoulos Pacificorp	x		
Robert Grover PPL Elec Util #3	x		
<u>Southern Co Transmission Planning</u> Todd Lucas Southern Co #1	x		

**Draft Comments and Considerations for 2<sup>nd</sup> Posting for Operate Within IROLs Standard Requirement 208 – RA Directives**

Joe Payne Mississippi Pwr Co #3 Travis Koval Southern Co #1 Bill Pope Gulf Pwr Co #3 John Clark Southern Co #1 David Johnson Savannah Electric #3			
John Horakh MAAC #2	x		
<u>BPA Adm TBL #1</u> James Murphy Mike Viles James Randall Al Johnson Jeff Newby Jim Gronquist Sylvia Wiggerhaus Brian Tuck Dick Spence Tracy Rolstad Steve Hitchens	x		
Darrell Richardson Illinois Power #1, 3	x		
David Thorne Pepco #1	x		
Ed Davis Entergy Services #1	x		
Albert DiCaprio MAAC #2	x		
Mark Heimbach PPL Generation #6	x		
<u>Centerpoint Energy #1</u> Richard Sikes John Jonte Wayne Kemper Glenn Hemperley Brad Calhoun	x		
Tony Jankowski We Energies #4		x	Should have a documentation level of noncompliance similar to sec. 204, 5.1
<b>Agreed. The standard was revised to reflect this change.</b>			
Stuart Goza TVA #1		x	
Alan Boesch NPPD #1		x	
Tom Pruitt Duke Power #1		x	



**Draft Comments and Considerations for 2<sup>nd</sup> Posting for Operate Within IROLs Standard Requirement 208 – RA Directives**

<p><u>Operating Reliability Working Group SPP</u>  Gerry Burrows KCP&amp;L #1  Bob Cochran SPS #1  Peter Kuebeck OG&amp;E #1  Scott Moore AEP #1  Tom Stuchlik Westar #1  Dan Boezio AEP #1  Matt Bordelon CLECO #1  Mike Crouch WFEC #1  Mike Gammon KCP&amp;L #1  Kevin Goolsby SPP #2  Bo Jones Westar #1  Allen Klassen Westar #1  Thad Ness AEP #1  Harold Wyble KCP&amp;L #1  Robert Rhodes SPP #2</p>		x	
<p>Charles Yeung Reliant #5</p>		x	
<p>Susan Morris SERC #2  Bill Reinke SERC #2  Sam Stryker Fayettevill PWC #3, 4, 5  Carter Edge SEPA #4, 5  Bill Thompson Dominion Trans #1</p>		x	
<p><u>FRCC Op, Eng &amp; Mkt Int</u>  Linda Campbell FRCC #2  Paul Elwing Lakeland Electric # 3  John Shaffer FPL #1  Bob Remley Clay Elec Coop #4  Patti Metro FRCC #2  Eirc Grant Progress Energy – FL #1  Joe Roos Ocala Electric Utility #3  Joe Krupar FL Muni Pwr Agency #3  Richard Gilbert Lakeland Electric #3  Bill Slater Progress Energy – FL #1  Amy Long Lakeland Electric #1</p>		x	

**Draft Comments and Considerations for 2<sup>nd</sup> Posting for Operate Within IROLs Standard Requirement 208 – RA Directives**

Roger Westphal Gainesville Regional Util #5 Bob Goss SEPA #5 Steve Wallace Seminore Electric Coop #4 Ted Hobson JEA #1			
<u>SERC Operations Planning Subcommittee</u> Carter Edge SEPA #4, 5 William Gaither So Carolina Pub Serv Auth #1 Mike Miller Southern Co #1 Roger Brand Muni Elec Auth GA #1 Phil Creech Progress Energy – CP&L #1 Gene Delk So Carolina Elec & Gas #1 Al McMeekin So Carolina Elec & Gas #1 Greg Ott Alcoa-Yadkin #1 Doug Newbaue GA System Operations #1 Mike Clements TVA #1 Don Reichenbach Duke Energy #1 Lynna Estep SERC #2 Mark Creech TVA #1		x	
Alan Johnson Mirant Americas Energy Mktg #6		x	
<u>Southern Company Generation &amp; Energy Mktg</u> Roman Carter # 5, 6 Joel Dison #5,6 Tony Reed #5,6 Lucius Burris #5,6 David Deerman #5,6 Clifford Shepard #5,6 Michael Smith #5,6 Lloyd Barnes SCGEM 5,6 Gary Miller SCGEM 5,6 Terry Crawley Southern Generation 5 Roger Green Southern Generation 5		x	

**Draft Comments and Considerations for 2<sup>nd</sup> Posting for Operate Within IROLs Standard Requirement 208 – RA Directives**

**Requirement 208 – Reliability Authority Directives - Other comments**

**Summary Consideration:** While there were many comments recommending specific changes, most commenters indicated support of the requirement, its measures and compliance elements.

- A level one non-compliance was added for instances where an entity followed the RA’s directives but did not document this.
- The performance reset period was modified so that it is consistent throughout this standard. The revised performance reset period , “12 months from the last violation”.

Suggestions to change the format of the compliance so that it cross referenced measures (e.g., “. . .as described in measure 2.1”) and were not adopted. When the standards are entered into a relational database and reports are generated, cross-references will be difficult to understand.

The Generator Operator was not added to the list of functions that must comply with RA directives because under the Functional Model, the RA directs the BA and the BA directs the Generators.

Commenter	Comments
Terry Bilke Midwest ISO #2	The “measures” section only say that the various authorities only have to document the directive and the actions they took (not that they actually followed the directive).
Both the requirement and the measure clearly stated that the entity responsible “. . . shall follow the reliability authority’s directives. . . “	
Stuart Goza TVA #1	<p>Generally, the Measures should be tied to the Requirements and the Objective Evidence for Compliance (OEC) should be tied to the Measures. Non-compliance could take several forms and levels of impact to reliability. The Levels of non-compliance should be objectively determined based on the evidence.</p> <p>Section 4.3.1 should be modified to read:</p> <p style="margin-left: 40px;">4.3.1. Operations log or other data source(s) to show the following for each instance of being issued a reliability authority directive relative to an interconnection reliability operating limit:</p> <p style="margin-left: 80px;">4.3.1.1. Date and time of each of directive received</p> <p style="margin-left: 80px;">4.3.1.2. Directive issued</p> <p style="margin-left: 80px;">4.3.1.3. Actions taken in response to directive in accordance with Measure 2.1</p> <p>Section 5 should be modified as follows:</p> <p>5. Levels of Non-compliance</p> <p style="margin-left: 20px;">5.1 Level one: Operations log or other data source(s) do not show one of the following:</p> <p style="margin-left: 40px;">5.1.1 Date and time of each of directive received</p> <p style="margin-left: 40px;">5.1.2 Directive issued</p> <p style="margin-left: 40px;">5.1.3 Actions taken in response to directive</p>

**Draft Comments and Considerations for 2<sup>nd</sup> Posting for Operate Within IROLs Standard Requirement 208 – RA Directives**

	<p>5.2 Level two: Operations log or other data source(s) do not show any of the following:</p> <p>5.1.4 Date and time of each of directive received</p> <p>5.1.5 Directive issued</p> <p>5.1.6 Actions taken in response to directive</p> <p>5.3 Level three: Not applicable.</p> <p>5.4 Level four: Did not follow directives.</p>
<p>The suggested format change was not adopted. The standards have been drafted to be as succinct as possible – and the additional words do not add anything to the standard. In addition, when the standards are completed, they will be available to the industry in a relational database with search capabilities. If the suggested cross-referencing were adopted, and someone downloaded a report that listed just the compliance elements for this standard, the cross references would lead the reader to believe that additional information could be found in the measures – and in many cases this is not true.</p> <p>Other commenters also suggested additional levels of non-compliance. A level one was added to address situations where the directives were followed, but weren't documented.</p>	
<p>Kathleen Goodman ISO-NE #2  <u>NPCC CP9</u>          Michael Schiavone National Grid USA #1          Roger Champagne Hydro-Quebec TransEnergie #1          Ralph Rufrano New York Power Authority #1          David Little Nova Scotia Power Inc. #1          David Kiguel Hydro One Networks #1          Michael Potishnak ISO-New England #2          Barry Gee National Grid USA #1          Dan Stosick ISO-New England #2          Fernando Saavedra ISO-New England #2          Greg Campoli New York ISO #2</p>	<p>Although we agree with the level four instance of non-compliance it would be beneficial for the compliance monitor to require data and other information surrounding the inaction.</p>
<p>If there were inaction, the RA would most likely notify the compliance monitor, and the compliance monitor would conduct a triggered investigation. During the triggered investigation, the compliance monitor may ask for additional details to determine the reason for not following the RA's directives.</p>	
<p>Peter Burke ATC #1</p>	<p>Opinion within ATC was divided over requirement 208. One side could agree with the requirement, its measures, and its monitoring process. The other side could not agree and specifically cited 208.1.2, 208.2.1, and 208.2.2, and those requirements to document directives and actions taken, as onerous.</p>
<p>The documentation should not be onerous as it is typically the same documentation currently logged in control rooms by system operators.</p>	
<p>Charles Yeung Reliant #5</p>	<p>The RA should have contractual arrangements in place with generators, transmission providers, control area operators and any entity that is required to respond to the "Actions" and "Action Plan" that expressly provides the RA the authority to execute this</p>

**Draft Comments and Considerations for 2<sup>nd</sup> Posting for Operate Within IROLs Standard Requirement 208 – RA Directives**

	Requirement.
	<p>The RA Certification SAR includes the following language: "Agreements must be in place defining the responsibilities and authority of the RELIABILITY AUTHORITY with respect to all Balancing Authorities, Interchange Authorities, Transmission Operators, Transmission Service Provider and all other applicable functional entities within the reliability area and with other Reliability Authorities. Agreements shall address both normal and emergency operations."</p> <p>This requirement places sanctions on entities that do not follow the RA's directives and assumes that the authority for issuing those directives has already been agreed upon as part of the RA Certification process.</p>
<p>Susan Morris SERC #2            Bill Reinke SERC #2            Sam Stryker Fayettevill PWC #3, 4, 5            Carter Edge SEPA #4, 5            Bill Thompson Dominion Trans #1</p>	<p>We believe the wording of this draft standard Section 208 Reliability Authority Directives, 1. Requirements, Item 1.1 is restricted to too few entities, needs to be expanded to encompass all functions and users of the power system, should recognize the RA is required to issue directives consistent with applicable tariffs and contract, and the RA is required to use Good Utility Practices. This requirement must be reworded:</p> <p>1.1. The reliability authority shall use applicable tariffs, contracts, and Good Utility Practice when directing use of the power system and all users of the power system shall follow the reliability authority's directives to:</p> <p>Prevent instances where interconnection reliability operating limits may be exceeded</p> <p>Mitigate the magnitude and duration of instances where interconnection reliability operating limits have been exceeded</p> <p>Generally, the Measures should be tied to the Requirements and the Objective Evidence for Compliance (OEC) should be tied to the Measures. Non-compliance could take several forms and levels of impact to reliability. The Levels of non-compliance should be objectively determined based on the evidence.</p> <p>Section 4.3.1 should be modified to read:</p> <p>4.3.1. Operations log or other data source(s) to show the following for each instance of being issued a reliability authority directive relative to an interconnection reliability operating limit:</p> <p>4.3.1.1. Date and time of each of directive received</p> <p>4.3.1.2. Directive issued</p> <p>4.3.1.3. Actions taken in response to directive in accordance with Measure 2.1</p>

**Draft Comments and Considerations for 2<sup>nd</sup> Posting for Operate Within IROLs Standard Requirement 208 – RA Directives**

	<p>Section 5 should be modified as follows:  Levels of Non-compliance  5.3 Level one: Operations log or other data source(s) do not show one of the following:  Date and time of each of directive received  Directive issued  Actions taken in response to directive  5.4 Level two: Operations log or other data source(s) do not show any of the following:  5.1.10 Date and time of each of directive received  5.1.11 Directive issued  5.1.12 Actions taken in response to directive  5.5 Level three: Not applicable.  Level four: Did not follow directives.</p>
<p>The Functional Model provides a 'chain of command' type of functional relationship that has been supported in the development of this standard. This 'chain of command' type of structure doesn't support having the RA direct all entites performing all functions, rather the Functional Model has the RA giving directives to a subset of functions, and this subset of functions then passes on instructions to other functions.</p> <p>Including specific language that references tariffs and market issues is outside the scope of NERC's reliability standards. There is no common definition for Good Utility Practice –consequently it is not possible to enforce compliance with Good Utility Practice.</p> <p>The suggested format change was not adopted. The standards have been drafted to be as succinct as possible – and the additional words do not add anything to the standard. In addition, when the standards are completed, they will be available to the industry in a relational database with search capabilities. If the suggested cross-referencing were adopted, and someone downloaded a report that listed just the compliance elements for this standard, the cross references would lead the reader to believe that additional information could be found in the measures – and in many cases this is not true.</p> <p>Other commenters also suggested additional levels of non-compliance. A level one was added to address situations where the directives were followed, but weren't documented.</p>	
<p>Gerald Rheault Manitoba Hydro #1, 3, 5, 6</p>	<p>the documentation in 4.1 is incomplete. For purpose of determining the acceptability of this item it was assumed that the intent was for the documentation to be similar to the wording for 207 item 4.1</p>
<p>The posted document was missing some data, but this was corrected and the missing information was added after the first few days of the 60-day posting.</p>	
<p>FRCC Op, Eng &amp; Mkt Int  Linda Campbell FRCC #2</p>	<p>Clarification of who is the entity responsible needs to be made throughout this requirement 208.</p>

**Draft Comments and Considerations for 2<sup>nd</sup> Posting for Operate Within IROLs Standard Requirement 208 – RA Directives**

<p>Paul Elwing Lakeland Electric # 3          John Shaffer FPL #1          Bob Remley Clay Elec Coop #4          Patti Metro FRCC #2          Eirc Grant Progress Energy – FL #1          Joe Roos Ocala Electric Utility #3          Joe Krupar FL Muni Pwr Agency #3          Richard Gilbert Lakeland Electric #3          Bill Slater Progress Energy – FL #1          Amy Long Lakeland Electric #1          Roger Westphal Gainesville Regional Util #5          Bob Goss SEPA #5          Steve Wallace Seminore Electric Coop #4          Ted Hobson JEA #1</p>	<p>Step 4.1 of the compliance monitoring process is not complete. It would seem that this 208 is a complement to 204. In 204 the RA is already documenting the actions directed, along with information if a violation occurred. This states that a level 4 is obtained if they did not follow directives. It would seem to make sense to only have this if they did not follow directives and a violation occurred. Perhaps consideration needs to be given to a lower non-compliance level for not documenting their actions, or lack of actions taken when given a directive.</p>
<p>There are places in this standard where the term, 'entity responsible' is used. In these cases, more than one entity may be responsible for complying with the requirement – and a decision was made that the standard would be less cumbersome to read if the term, 'the entity responsible' was used rather than listing all the entities that must comply. For this requirement, the entities responsible include entities performing the following functions: transmission operator, balancing authority and interchange authority</p> <p>The posted document was missing some data, but this was corrected and the missing information was added after the first few days of the 60-day posting.</p> <p>Other commenters also suggested additional levels of non-compliance. A level one was added to address situations where the directives were followed, but weren't documented.</p>	
<p>Alan Boesch NPPD #1</p>	<p>Documentation is not a reliability issue          The entity should only document the actions taken. The RA should document the directive.          The level of non-compliance only deals with following the directives. Why are there measurements (documentation) that are not compliance issues? Either they should not be measurements (my choice because failure to document is not a reliability issue), or the should have a compliance measure.</p>

**Draft Comments and Considerations for 2<sup>nd</sup> Posting for Operate Within IROLs Standard Requirement 208 – RA Directives**

<p>When it isn't possible or practical to measure performance in 'real time', the compliance monitor may use physical evidence like documentation, to assess compliance. The standard requires that both the RA and the entities following the RA's directives document the directives issued. In areas where the RA's directives weren't followed, and the compliance monitor conducts a triggered investigation, any mismatch between the records could help in the investigation.</p> <p>Several commenters suggested additional levels of non-compliance. A level one was added to address situations where the directives were followed, but weren't documented.</p>	
<p>Dan Boezio &amp; Raj Rana AEP #1, 3, 5, 6</p>	<p>Defined terms should be capitalized, such as "Reliability Authority", "Operational Planning Analyses", "Interconnected Reliability Operating Limits", etc</p> <p>208.1.1: Add generator operator.</p> <p>208.2.1: The requirement for the entity responsible to follow the Reliability Authority's directives is already stated in the requirements section and does not need to be restated in the measures section. Suggest rewording as follows: "The entity responsible shall document the directives of the Reliability Authority and the actions taken to meet those directives."</p>
<p>The suggestion that defined terms be capitalized has been adopted and is reflected in the revised standard.</p> <p>The generator operator was not added to the list of functions that must comply with this standard because under the Functional Model, the generator operator takes direction from the balancing authority, not the reliability authority.</p> <p>Some commenters indicated a preference for including a measure that specifically addresses each of the requirements. The measures are intended to identify the elements that the compliance monitor will look at to determine if the desired performance has been achieved –there is nothing wrong in including the same language in both the requirement and the measures.</p>	
<p>Tony Jankowski We Energies #4</p>	<p>Modify section 208.5.1 to read "Level one: Did not properly document an issued directive and/or the subsequent action taken."</p>
<p>Several commenters suggested additional levels of non-compliance. A level one was added to address situations where the directives were followed, but weren't documented.</p>	
<p>Michael Sidiropoulos Pacificorp</p>	<p>Suggestion: Include generator operator in section 1.1</p>
<p>The generator operator was not added to the list of functions that must comply with this standard because under the Functional Model, the generator operator takes direction from the balancing authority, not the reliability authority.</p>	



**Draft Comments and Considerations for 2<sup>nd</sup> Posting for Operate Within IROLs Standard Requirement 208 – RA Directives**

<p><u>Operating Reliability Working Group SPP</u>  Gerry Burrows KCP&amp;L #1  Bob Cochran SPS #1  Peter Kuebeck OG&amp;E #1  Scott Moore AEP #1  Tom Stuchlik Westar #1  Dan Boezio AEP #1  Matt Bordelon CLECO #1  Mike Crouch WFEC #1  Mike Gammon KCP&amp;L #1  Kevin Goolsby SPP #2  Bo Jones Westar #1  Allen Klassen Westar #1  Thad Ness AEP #1  Harold Wyble KCP&amp;L #1  Robert Rhodes SPP #2</p>	<p>Generator operators need to be added to the entities listed in Requirement 1.1.</p> <p>Requirement 1.2 is repeated again in Measure 2.1.</p> <p>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.</p>
<p>The Functional Model provides a 'chain of command' type of functional relationship that has been supported in the development of this standard. This 'chain of command' type of structure doesn't support having the RA direct all entities performing all functions, rather the Functional Model has the RA giving directives to a subset of functions, and this subset of functions then passes on instructions to other functions. The generator operator was not added to the list of functions that must comply with this standard because under the Functional Model, the generator operator takes direction from the balancing authority, not the reliability authority.</p> <p>Some commenters indicated a preference for including a measure that specifically addresses each of the requirements. The measures are intended to identify the elements that the compliance monitor will look at to determine if the desired performance has been achieved –there is nothing wrong in including the same language in both the requirement and the measures.</p> <p>In many instances, how well a RA's directives are followed is a function of the communication skills of the system operator providing direction. If the RA's directives include timing, then it is fair to include a consideration of timing when assessing non-compliance. If the RA's directives do not include a timing requirement, then this would be impossible to measure objectively.</p>	
<p><u>MAAP Ops Subcommittee #2</u>  Llyod Linke MAPP  Allan Silk Manitoba Hydro  Paul Brune NPPD  Tod Gosnell Omaha Public Pwr Dist  Paul Koskela Minnesota Pwr  Larry Larson Otter Tail Power</p>	<p>Please clarify if the intention here is for entities to comply with the RAs directives in cases that those directives are proscribed by an existing operating guide – or in all cases? If a Reliability Authority is issuing an order that conflicts with a standing operating guide, then the RA must first explicitly/formally invalidate the guide prior to issuing the directive. Please provide information regarding how liability will be assigned for actions that are found to be improper that result in harm.</p>

**Draft Comments and Considerations for 2<sup>nd</sup> Posting for Operate Within IROLs Standard Requirement 208 – RA Directives**

<p>Derrick Moe WAPA  Dick Pursley Great River Energy  Martin Trencé Xcel Energy  Joseph Knight MAPPCOR</p>	
<p>This requirement addresses following the RAs directives issued relative to preventing or mitigating instances of exceeding IROLs. These directives may include proscribed actions from the RAs Action Plan (requirement 207) or may be a new set of actions based on the current operating conditions. In some cases, the RA doesn't have time to provide a detailed explanation of why an Action Plan isn't being followed. Addressing liability issues is outside the scope of the SDT but may be addressed in formal agreements with the RA.</p>	
<p>Darrell Richardson Illinois Power #1, 3</p>	<p>This does not allow for a directive to be challenged. It is either comply with the directive or don't and suffer the results. It would seem that you should have the right to request additional or further discussion surrounding the directive.</p>
<p>In some cases, the RA doesn't have time to provide a detailed explanation of why an Action Plan isn't being followed. In some circumstances, an RA must contact several different entities, asking each entity to take a different action. Requesting additional information from the RA or holding a discussion with the RA may be possible, and there is nothing in this standard that precludes that.</p>	
<p>Ed Davis Entergy Services #1</p>	<p>We believe the wording of this draft standard Section 208 Reliability Authority Directives, 1. Requirements, Item 1.1 is restricted to too few entities, needs to be expanded to encompass all functions and users of the power system, should recognize the RA is required to issue directives consistent with applicable tariffs and contract, and the RA is required to use Good Utility Practices. This requirement must be reworded:</p> <p style="color: red;">1.1. The reliability authority shall use applicable tariffs, contracts, and Good Utility Practice when directing use of the power system, and all users of the power system shall follow the reliability authority's directives to:</p> <p>1.1.1.1. Prevent instances where interconnection reliability operating limits may be exceeded</p> <p>1.1.1.2. Mitigate the magnitude and duration of instances where interconnection reliability operating limits have been exceeded</p>
<p>The Functional Model provides a 'chain of command' type of functional relationship that has been supported in the development of this standard. This 'chain of command' type of structure doesn't support having the RA direct all entites performing all functions, rather the Functional Model has the RA giving directives to a subset of functions, and this subset of functions then passes on instructions to other functions.</p> <p>Including specific language that references tariffs and market issues is outside the scope of NERC's reliability standards. There is no common definition for Good Utility Practice –consequently it is not possible to enforce compliance with Good Utility Practice .</p>	
<p>SERC Operations Planning Subcommittee  Carter Edge SEPA #4, 5</p>	<p>Generally, the Measures should be tied to the Requirements and the Objective Evidence for Compliance (OEC) should be tied to the Measures. Non-compliance could</p>

**Draft Comments and Considerations for 2<sup>nd</sup> Posting for Operate Within IROLs Standard Requirement 208 – RA Directives**

<p>William Gaither So Carolina Pub Serv Auth #1          Mike Miller Southern Co #1          Roger Brand Muni Elec Auth GA #1          Phil Creech Progress Energy – CP&amp;L #1          Gene Delk So Carolina Elec &amp; Gas #1          Al McMeekin So Carolina Elec &amp; Gas #1          Greg Ott Alcoa-Yadkin #1          Doug Newbaue GA System Operations #1          Mike Clements TVA #1          Don Reichenbach Duke Energy #1          Lynna Estep SERC #2          Mark Creech TVA #1</p>	<p>take several forms and levels of impact to reliability. The Levels of non-compliance should be objectively determined based on the evidence.</p> <p>Section 4.3.1 should be modified to read:</p> <p style="padding-left: 40px;">4.3.1. Operations log or other data source(s) to show the following for each instance of being issued a reliability authority directive relative to an interconnection reliability operating limit:</p> <p style="padding-left: 80px;">4.3.1.1. Date and time of each of directive received</p> <p style="padding-left: 80px;">4.3.1.2. Directive issued</p> <p style="padding-left: 80px;">4.3.1.3. Actions taken in response to directive <b>in accordance with Measure 2.1</b></p> <p>Section 5 should be modified as follows:</p> <p>Levels of Non-compliance</p> <p>5.6 Level one: <b>Operations log or other data source(s) do not show one of the following:</b></p> <p style="padding-left: 40px;">5.1.13 Date and time of each of directive received</p> <p style="padding-left: 40px;">5.1.14 Directive issued</p> <p style="padding-left: 40px;">5.1.15 Actions taken in response to directive</p> <p>5.7 Level two: <b>Operations log or other data source(s) do not show any of the following:</b></p> <p style="padding-left: 80px;">Date and time of each of directive received</p> <p style="padding-left: 80px;">Directive issued</p> <p style="padding-left: 80px;">Actions taken in response to directive</p> <p>5.8 Level three: Not applicable.</p> <p>5.9 Level four: Did not follow directives.</p>
<p>The suggested format change was not adopted. The standards have been drafted to be as succinct as possible – and the additional words do not add anything to the standard. In addition, when the standards are completed, they will be available to the industry in a relational database with search capabilities. If the suggested cross-referencing were adopted, and someone downloaded a report that listed just the compliance elements for this standard, the cross references would lead the reader to believe that additional information could be found in the measures – and in many cases this is not true.</p> <p>Several commenters suggested additional levels of non-compliance. A level one was added to address situations where the directives were followed, but weren't documented.</p>	

**Draft Comments and Considerations for 2<sup>nd</sup> Posting for Operate Within IROLs Standard Requirement 208 – RA Directives**

<p>Alan Johnson Mirant Americas Energy Mktg #6</p>	<p>Suggest that the generator operator function be added to section 1.1. Regarding the levels of non-compliance, agree that an entity should be penalized for not following a RA's directive, but question whether it is appropriate to take every violation to level four.</p>
<p>The generator operator was not added to the list of functions that must comply with this standard because under the Functional Model, the generator operator takes direction from the balancing authority, not the reliability authority.</p> <p>Most industry commenters supported a level four violation for not following the RA's directives.</p>	
<p><u>Southern Company Generation &amp; Energy Mktg</u>          Roman Carter # 5, 6          Joel Dison #5,6          Tony Reed #5,6          Lucius Burris #5,6          David Deerman #5,6          Clifford Shepard #5,6          Michael Smith #5,6          Lloyd Barnes SCGEM 5,6          Gary Miller SCGEM 5,6          Terry Crawley Southern Generation 5          Roger Green Southern Generation 5</p>	<p>If the RA makes an unreasonable request for data, whether it be the type of data needed or the timing of the data, the Transmission Operator, Balancing Authority, and the Interchange Authority will be considered totally (level 4) out of compliance if they do not fully comply. Therefore, a graduated scale is recommended.</p>
<p>This requirement is for RA directives relative to preventing or mitigating instances of exceeding IROLs. The data provision requirement was modified to indicate that there will only be a level four non-compliance if data is not provided as specified and the entities involved aren't able to resolve the situation. If an RA makes an unreasonable request for data, then the entity required to provide the data could try to resolve the issue with the RA or could use the dispute resolution process to resolve the issue. Note that the requirement that addresses the RA's Data Specification was modified to state more clearly that the data addressed by the data specification is limited to the data needed by the RA for monitoring and assessments relative to IROLs.</p>	

## Consideration of Comments on 2<sup>nd</sup> Posting of Operate Within Interconnection Reliability Operating Limits Standard Comments on Definitions

Do you agree with the definitions provided in the front of this standard?

**Summary Consideration:** The SDT made the following changes based on comments submitted by industry participants.

The following definitions are not used in the standard and have been eliminated:

- Documentable Interconnection Reliability Operating Limit Violation
- Interconnection Reliability Operating Limit Violation
- Reportable Interconnection Reliability Operating Limit Violation.

Two new terms were added, “Event Duration” and “Wide Area Impact”

Real-time Monitoring and Real-time Assessments were revised to improve the distinction between the two terms. Real-time Monitoring is more passive than Real-time Assessments and the revised definitions help clarify this.

The term, “Reliability Authority Area” was revised to conform with the definition provided in the draft changes to the Functional Model.

The term, “Self-certification” was revised to better reflect the intent of the self-certification process.

The term, “T<sub>v</sub>” was revised to better align with its application in this standard.

The term, “Real-time” was revised to better convey what was intended when this term is used in the standard.

Where a definition had included additional language to explain how the term applied to this standard, the additional language was dropped from the definition. This approach was applied to the following terms:

- Interconnection Reliability Operating Limit
- Operational Planning Analysis

The definition for Transmission Operator was transposed with that for Transmission Service Provider and this has been corrected.

Where an individual comment was submitted recommending a change to a term that was approved as part of the NERC Glossary of Terms, the definition was not changed.

- Bulk Electric System
- Cascading Outages
- Real – time Assessment
- Self - certification

Other minor ‘wordsmithing’ changes were made

Commenter	Yes	No	Comments
FRCC Op, Eng & Mkt Int Linda Campbell FRCC #2 Paul Elwing Lakeland Electric # 3	x		Most of the definitions are very helpful. However, we do have some questions on a few of them. - There is a definition for Real-time Monitoring and one for Real-time

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<p>John Shaffer FPL #1          Bob Remley Clay Elec Coop #4          Patti Metro FRCC #2          Eric Grant Progress Energy – FL #1          Joe Roos Ocala Electric Utility #3          Joe Krupar FL Muni Pwr Agency #3          Richard Gilbert Lakeland Electric #3          Bill Slater Progress Energy – FL #1          Amy Long Lakeland Electric #1          Roger Westphal Gainesville Regional Util #5          Bob Goss SEPA #5          Steve Wallace Seminole Electric Coop #4          Ted Hobson JEA #1</p>			<p>Assessment. The monitoring definition states "To use vision and hearing.." while the assessment definition states to collect and review immediately available data. It seems to us that the monitoring definition is really unnecessary, as we believe the intent is really covered in the assessment definition.</p> <ul style="list-style-type: none"> <li>- The definition for Operational Planning Analysis states, "The analysis should ensure that no IROLs will be exceeded." Is that really true for the analysis? Doesn't the analysis identify potential problems that need to be acted upon, so that it is really the actions of entities, not the analysis itself, that ensures no limit will be exceeded?</li> <li>- The definition of transmission operator in this document does not agree with the definition of transmission operator in the Functional Model. This definition actually is the same as the transmission service provider function. It appears there is still confusion over the functions defined in the functional model which is alarming since we are developing the reliability standards based on those functions.</li> </ul>
<p>The definitions for real-time monitoring and real-time assessments were revised to better distinguish between monitoring and assessing. The revised definitions clarify that assessing is more active than monitoring.</p>			
<p>The definition of the Operational Planning Analysis was revised as follows: <b>Operational Planning Analysis:</b> An examination of the expected system conditions, given the load forecast(s) and known system constraints, some examples being transmission facility outages, generator outages and equipment limitations. <del>"The analysis should ensure that no interconnection reliability operating limits will be exceeded during expected normal operation. An operational planning analysis is done up to seven days ahead of the expected conditions."</del> The descriptive information following the first sentence was dropped because it was not really part of the definition.</p>			
<p>As noted, the definition of Transmission Operator was incorrectly copied from the Functional Model. This was a transposition error, not an indication of confusion over the definitions.</p>			
<p><u>Centerpoint Energy #1</u>          Richard Sikes          John Jonte          Wayne Kemper          Glenn Hemperley          Brad Calhoun</p>	<p>x</p>		<p>We do not understand the total reason for changing Operations Security Limit to Interconnection Reliability Operating Limit, given its implications.</p>
<p>The Operating Limits Definitions Task Force (OLDTF) met with the Standards Drafting Team (SDT) and encouraged the SDT to adopt as much of the work of the OLDTF as possible. The OLDTF determined that the term, "Operations Security Limit" was interpreted to mean different things by different entities, and recommended that the SDT avoid use of the term, "Operations Security Limit".</p>			
<p>John Horakh MAAC #2</p>	<p>x</p>		<p>The definitions involving Interconnection Reliability Operating Limit need to be cleaned up to increase clarity and to eliminate duplication.</p>

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			<p>Remove the definition for “Documentable Interconnection Reliability Operating Limit Violation”</p> <p>Remove the definition for “Reportable Interconnection Reliability Operating Limit Violation”</p> <p>Change, as follows, the definition for “Interconnection Reliability Operating Limit Event: An instance of exceeding an Interconnection Reliability Operating Limit for any length of time. The event must be documented (logged).”</p> <p>Change, as follows, the definition for “Interconnection Reliability Operating Limit Violation: An instance of exceeding an Interconnection Reliability Operating Limit for a time greater than or equal to Tv. This is an event that has progressed to also become a violation. The event must be documented and the violation must be reported (to the compliance monitor).”</p>
<p>The definitions for Documentable IROL, Reportable IROL Violations, and IROL Violations are not used in the standard and have been dropped. Suggested changes for adding more language to the definitions were not supported because several entities requested the exact opposite change. Explanatory information that identifies how the term is applied in a particular standard is not needed.</p>			
Albert DiCaprio MAAC #2	x		<p>I would suggest that the terms Documentable IROL Violation and IROL Event be combined in a single definition. Offer the following: IROL Event: An instance.....for any length of time. These events are documentable IROL violations. Similarly for IROL Violation and Reportable IROL Violation.</p>
David Thorne Pepco #1			
Robert Grover PPL Elec Util #3			
<p>The definitions for Documentable, Reportable IROL Violations, and IROL Violations are not used in the standard and have been dropped. Suggested changes for adding more language to the definitions were not supported explanatory information that identifies how the term is applied in a particular standard is not needed.</p>			
William Smith Allegheny Power #1	x		
Ken Githens Allegheny Energy Supply #5	x		
Raymond Mammarella PPL Elec Util #1	x		
Darrell Richardson Illinois Power #1, 3	x		
Alan Johnson Mirant Americas Energy Mktg #6	x		
Mark Heimbach PPL Generation #6	x		
Peter Burke ATC #1	x		
Charles Yeung Reliant #5	x		
Alan Boesch NPPD #1		x	<p>The definition for Transmission Operator is incorrect. The definition is word for word the definition of the Transmission Service Provider in the Functional Model. It appears the wrong definition was used. The</p>

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			right definition is in the functional model.
As noted, the definition of Transmission Operator was incorrectly copied from the Functional Model.			
Dan Boezio & Raj Rana AEP #1, 3, 5, 6		x	<p>“Documentable Interconnection Reliability Operating Limit Violation” and “Interconnection Reliability Operating Limit Event” have identical definitions. Two terms having the same definition leads to confusion. Eliminate one of the terms and modify Standard accordingly.</p> <p>“Interconnection Reliability Operating Limit” definition - Second sentence contains a reporting requirement for the Reliability Authority. A definition should simply define the term. Required actions are to be contained in the standard itself. Delete sentence two. First sentence is confusing it that it appears to imply that there just may be certain situations where “instability, uncontrolled separation, or cascading outages” may NOT “adversely impact the reliability of the bulk transmission system”. Assuming this is not the intent, consider rewording as:</p> <p>Interconnection Reliability Operating Limit: A System Operating Limit on the Bulk Electric System that if exceeded, could lead to instability, uncontrolled separation, or cascading outages.</p> <p>Real-time Monitoring: Standard 202 implies that “Real-time Monitoring” is an activity to be performed as opposed to equipment in place that simply facilitates that function. Consider rewording as:</p> <p>Real-time Monitoring: Draw conclusions from various Real-time Data sources.</p> <p>Operational Planning Analysis: The last sentence specifies that such an analysis is performed up to seven days ahead of expected conditions. Sentence is unnecessary and confusing. Neither 203.1 or 203.2 does not specify a time horizon for the Operational Planning Analysis beyond the ‘next day’.</p> <p>Real-time: definition not necessary, consider deleting.</p> <p>Real-time Data: Consider rewording as “ Readily available measured values of existing system parameters, state estimator values.....”</p> <p>Tv: Definition confusion. Consider: Minimum time of a system parameter that exceeds an Interconnection Reliability Operating Limit</p>



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		<p>that requires a report to the Compliance Monitor.</p> <p>Real-time Assessment: The second sentence is not needed. Required actions are to be contained in the standard itself. Additionally, real-time assessments can be performed others, not just the RA.</p> <p>“Interconnection Reliability Operating Limit Violation” and “Reportable Interconnection Reliability Operating Limit Violation” have the same definition. Two terms having the same definition leads to confusion. Eliminate one of the terms and modify Standard accordingly.</p> <p>Self-certification: Remove the second and third sentences. They are editorial comments that do not belong in a definition. If the comments are relevant to a particular standard, then they belong in the Compliance Monitoring Process section of the Standard.</p> <p>Transmission Operator: The definition given sounds more like the definition of a Transmission Service Provider. The Functional Model Review Task Force in their January 1, 2003 Group Report defined Transmission Operator as: “The entity that operates the transmission facilities and executes switching orders.”</p>
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1. The definition for Documentable IROL is not used in the standard and has been dropped.
2. Explanatory information that identified how the term, "IROL" would be applied in this standard is not needed and has been dropped. Suggested change to remove the phrase, ". . . adversely impact the reliability of the bulk transmission system." Was not adopted. This language has been used in the standard since the initial posting of the SAR.
3. The definition of "Real-time Monitoring" was modified to read as follows: "The act of scanning data and drawing conclusions about what the data indicates." This supports the recommended change while retaining the words needed to reinforce the concept that this requires some physical activity.
4. The definition of "Operational Planning Analysis" was truncated so that the explanatory information was dropped from the definition.
5. The definition was added at the request of several industry participants.
6. The definition of "Real-time data" was not changed as suggested. Although the suggested change would keep from using part of the term in the definition of the term, the suggested change did not improve the understandability of the definition and was not adopted.
7. The definition of  $T_v$  was revised to read as follows: "The maximum time that an IROL can be exceeded without compliance sanctions being applied." This supports the recommended change as well as changes recommended by others.
8. The definition of "Real-time Assessment" was truncated so that the explanatory information was dropped from the definition.
9. The definition for Reportable IROL Violation is not used in the standard and has been dropped.
10. The definition of "Self-certification" was truncated so that the explanatory information was dropped from the definition. The definition was further revised to more clearly identify the intent of the self-certification process, based on changes recommended by others.
14. As noted, the definition of Transmission Operator was incorrectly copied from the Functional Model.

John Blazekovich Exelon Corp #1, 3, 5, 6		x	<p>Exelon recommends the following definition changes to eliminate terminology from the definitions that is vague and therefore can lead to different interpretations and uncertainty as to whether there is a violation of the standard.</p> <p>Cascading Outages: The uncontrolled successive loss of system elements triggered by an incident at any location. Cascading results in <del>widespread</del> service interruption, which cannot be restrained from sequentially spreading. <del>beyond an area predetermined by appropriate studies.</del></p> <p>Interconnection Reliability Operating Limit: A system operating limit that, if exceeded, could lead to instability, uncontrolled separation, or cascading outages. <del>that adversely impact the reliability of the bulk transmission system.</del> The reliability authority must log each case of</p>
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			exceeding an interconnection reliability operating limit, and must report (to its compliance monitor) each case of exceeding an interconnection reliability operating limit for a time greater than or equal to Tv. Note that Tv may be zero.
<p>The term, “Cascading Outages” was not changed. The original definition better relays the ideas supported in this standard. In addition, the original definition was reviewed and approved as part of the NERC Glossary of Terms.</p> <p>Suggested change to remove the phrase, “. . . adversely impact the reliability of the bulk transmission system.” was not adopted. This language has been used in the standard since the initial posting of the SAR.</p>			
Tom Pruitt Duke Power #1		x	A definition for Minimum Return Time should be included (the minimum period in seconds that a value must remain below an IROL limit after an excursion has occurred. If the value again exceeds IROL before this time limit, the event continues.).
<p>The definition was not added because it is no longer needed. Specific language was added to the standard to identify that the duration of exceeding any IROL is measured from the point in time where the IROL is first exceeded to the point in time where the parameter’s value remains at a level at or below the IROL for a minimum of 30 seconds.</p>			
Tony Jankowski We Energies #4		x	Real time monitoring: Vision and hearing does not comply with the Americans with Disabilities Act. “To use human or automated means” Reliability Authority Area: “interconnection (tie-line) metering”. This provision is for a Balancing Authority and Energy Management, not the RA. The Reliability Authority area consists of all assets under the control and responsibility of the RA.
<p>The Americans with Disabilities Act does not preclude any organization from establishing physical requirements based on the ‘essential duties’ of a specific job. Monitoring system conditions is an essential system operator duty. The term, ‘real-time monitoring’ was revised by replacing the phrase, “To use vision and hearing to scan. . .” with the phase, “The act of scanning . . .”</p> <p>The “Reliability Authority Area” was not defined in the original Functional Model. The latest draft of proposed changes to the Functional Model does include a definition of the Reliability Authority Area and this was adopted in the changes to this standard.</p>			
Michael Sidiropoulos Pacificorp		x	In the definition of cascading outages the term “beyond an area predetermined by appropriate studies” should be specifically defined. Suggestion: “beyond the control area of the initial disturbance”.
<p>These new reliability standards are being written assuming that the industry is organized using the terminology in the Functional Model – so in the new standards the Reliability Authority Reliability Area is used instead of a Control Area. Some relays are installed as a result of joint studies conducted to look at a sequence of actions that may occur in a region that is greater than a single Reliability Authority’s Reliability Area.</p>			
Operating Reliability Working Group SPP Gerry Burrows KCP&L #1 Bob Cochran SPS #1		x	The SDT should utilize the NERC functional model and thoroughly review and correct all definitions associated with this standard. Some definitions included in this standard are not needed and others don’t

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<p>Peter Kuebeck OG&amp;E #1          Scott Moore AEP #1          Tom Stuchlik Westar #1          Dan Boezio AEP #1          Matt Bordelon CLECO #1          Mike Crouch WFEC #1          Mike Gammon KCP&amp;L #1          Kevin Goolsby SPP #2          Bo Jones Westar #1          Allen Klassen Westar #1          Thad Ness AEP #1          Harold Wyble KCP&amp;L #1          Robert Rhodes SPP #2</p>			<p>appear to belong in the standard. Others are simply the wrong definition. Noting the comment box on page 3 of the standard, we wonder why a definitions section was even included in the standard.</p> <p>Here are some specific problem definitions:          Real-time Monitoring and the use of vision and hearing to define this term.          Real-time – Shouldn't historical time also be included?          Self-certification – Why is this term included in this standard? It probably belongs in the Compliance Enforcement Document. The second sentence doesn't appear to be a part of the definition.          Transmission Operator has the wrong definition. The definition given is the definition for Transmission Service Provider.          Documentable Interconnection Reliability Operating Limit Violation and Interconnection Reliability Operating Limit Event have the exact same definition.          Reportable Interconnection Reliability Operating Limit Violation and Interconnection Reliability Operating Limit Violation are basically the same definition.          Tv should be listed as T<sub>v</sub>.</p>
<p>The term, 'real-time monitoring' was revised by replacing the phrase, "To use vision and hearing to scan. . ." with the phrase, "The act of scanning . . ."</p> <p>It is not clear why historical time should be included in a definition of real time.</p> <p>Self-certification is used in this standard and hasn't been previously defined in the glossary of terms associated with Reliability Standards. Several entities requested that the term be defined during the last posting of this standard.</p> <p>The definition for Transmission Operator was transposed with the definition for Transmission Service Provider.</p> <p>Reportable Interconnection Reliability Operating Limit Violation and Interconnection Reliability Operating Limit Violation are not used in the standard and have been dropped from the list of defined terms.</p> <p>The missing subscript "Tv" rather than "T<sub>v</sub>", is a typo and has been corrected.</p>			
<p><u>Southern Co Transmission Planning</u>          Todd Lucas Southern Co #1          Joe Payne Mississippi Pwr Co #3          Travis Koval Southern Co #1          Bill Pope Gulf Pwr Co #3</p>		<p>x</p>	<p>The term "Documentable Interconnection Reliability Operating Violation" is never used in the standard and has the same definition as "Interconnection Reliability Operating Event". Likewise, the term "Reportable Interconnection Reliability Operating Violation" is never used in the standard and has the same definition as "Interconnection Reliability Operating Violation". We suggest that the terms</p>

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<p>John Clark Southern Co #1 David Johnson Savannah Electric #3</p>			<p>"Documentable Interconnection Reliability Operating Violation" and "Reportable Interconnection Reliability Operating Violation" be deleted from the list of definitions.</p>
<p>The terms, "Documentable Interconnection Reliability Operating Violation" and "Reportable Interconnection Reliability Operating Violation" were dropped from the list of definitions.</p>			
<p><u>MAAP Ops Subcommittee #2</u> Llyod Linke MAPP Allan Silk Manitoba Hydro Paul Brune NPPD Tod Gosnell Omaha Public Pwr Dist Paul Koskela Minnesota Pwr Larry Larson Otter Tail Power Derrick Moe WAPA Dick Pursley Great River Energy Martin Trence Xcel Energy Joseph Knight MAPPCOR</p>		<p>x</p>	<p>Operational Planning Analysis – Omit the word “peak” in the first sentence as a qualifier for load. There may be instances where reliability is compromised during non-peak load conditions. The analysis should be done over a range of loads based on forecasts.</p>
<p>The suggested change was made.</p>			
<p><u>BPA Adm TBL #1</u> James Murphy Mike Viles James Randall Al Johnson Jeff Newby Jim Gronquist Sylvia Wiggerhaus Brian Tuck Dick Spence Tracy Rolstad Steve Hitchens</p>		<p>x</p>	<p>Operational Planning Analysis - There should be no time component to this definition. As long as it has been completed prior to when it is needed. Tv - Should include maximum response time.</p>
<p>Operational Planning Analysis - The descriptive information following the first sentence was dropped because it was not really part of the definition.</p>			
<p>T<sub>v</sub> – The definition was revised to include a reference to maximum response time. The revised definition is: "The maximum time that an IROL can be exceeded without compliance sanctions being applied"</p>			
<p>Donald Idzior Consumers Energy #4</p>		<p>x</p>	<p>I would recommend the definition Tv and section 1.2.1 be made consistent. As the standard now reads, the definition of Tv is the violation time associated with a limit. Section 1.2.1 refers to the identification of Tv as a response time. Those are two very different things.</p>

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			<p>The response limit must be the total time from when a flow/voltage/stability limit is first violated to when operator action is initiated and finally the system (transaction curtailments/generation redispatch/switching/load control action...) responds to bring the violated operating limit back to below the limit.</p> <p>The definition should be changed to bring it in line with the usage in the standard.</p>
<p><b>T<sub>v</sub> – The definition was revised to include a reference to maximum response time. The revised definition is: “The maximum time that an IROL can be exceeded without compliance sanctions being applied“</b></p>			
<p>Ed Davis Entergy Services #1</p> <p>Susan Morris SERC #2</p> <p>Bill Reinke SERC #2</p> <p>Sam Stryker Fayettevill PWC #3, 4, 5</p> <p>Carter Edge SEPA #4, 5</p> <p>Bill Thompson Dominion Trans #1</p>		<p>x</p>	<p>Operational Planning analyses are conducted for time periods up to 13-months into the future. Please revise the definition as follows: Operational Planning Analysis: “ .... An operational planning analysis is done for the next day’s operation and up to 13-months ahead of the expected conditions.”</p> <p>The Transmission Owner has fiduciary responsibility for his owned facilities. Therefore he has ultimate responsibility and liability for owning, maintaining and operating his facilities to protect his stockholders’ and lending institutions’ investments. The Transmission Owner then is ultimately responsible for establishing system operating limits, including T<sub>v</sub>, for his facilities. Therefore, the definition of T<sub>v</sub> should be revised to: “T<sub>v</sub>: The violation time associated with a limit that is determined by the Transmission Owner for equipment-based limits, and by the Reliability Authority and Planning Authority for system-based limits.”</p> <p>The responsibilities of the RA are to “monitor” the system, not “control” the system. Therefore, we suggest the following change: Reliability Authority Area: A defined electrical system bounded by interconnection (tie-line) metering and telemetry monitored by a single reliability authority.</p>

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The definition of “Operational Planning Analysis” was truncated to omit the language that explained how the term applied to this standard. The revised definition of Operational Planning Analysis is as follows: “An examination of the expected system conditions, given the load forecast(s), known system constraints some examples being transmission facility outages, generator outages and equipment limitations.”

The recommended change to T<sub>v</sub> was not made, because the responsibility for establishing reliability-related limits is assigned to the Reliability Authority, not the equipment owners. The Determine Facility Ratings SDT is working on the standard that establishes the facility owners’ rights to establish facility ratings – and requires the entities that develop operating limits to respect the facility ratings in developing the operating limits.

The term, “Reliability Authority Area” was revised to conform with the definition provided in the draft changes to the Functional Model. Your recommendation that the standard reflect that the RA monitor rather than control the system was adopted and is reflected in the changes made to the monitoring requirement (202).

<p><u>SERC Operations Planning Subcommittee</u> Carter Edge SEPA #4, 5 William Gaither So Carolina Pub Serv Auth #1 Mike Miller Southern Co #1 Roger Brand Muni Elec Auth GA #1 Phil Creech Progress Energy – CP&amp;L #1 Gene Delk So Carolina Elec &amp; Gas #1 Al McMeekin So Carolina Elec &amp; Gas #1 Greg Ott Alcoa-Yadkin #1 Doug Newbaue GA System Operations #1 Mike Clements TVA #1 Don Reichenbach Duke Energy #1 Lynna Estep SERC #2 Mark Creech TVA #1</p> <p>Susan Morris SERC #2 Bill Reinke SERC #2 Sam Stryker Fayettevill PWC #3, 4, 5 Carter Edge SEPA #4, 5 Bill Thompson Dominion Trans #1</p>		x	<p>Based on the following definitions, we do not believe that the definition of “<i>Documentable Interconnection Reliability Operating Limit Violation</i>” is necessary (is it truly a violation?). It appears that it is identical to the definition of “<i>Interconnection Reliability Operating Limit Event</i>” and the fact that an “<i>event</i>” must be documented is contained in the definition of “<i>Interconnection Reliability Operating Limit</i>”.</p> <p>Documentable Interconnection Reliability Operating Limit Violation: An instance of exceeding an interconnection reliability operating limit for any length of time.</p> <p>Interconnection Reliability Operating Limit Event: An instance of exceeding an interconnection reliability operating limit for any length of time.</p> <p>Interconnection Reliability Operating Limit Violation: An instance of exceeding an interconnection reliability operating limit for time greater than or equal to T<sub>v</sub>.</p> <p>Interconnection Reliability Operating Limit: A system operating limit that, if exceeded, could lead to instability, uncontrolled separation, or cascading outages that adversely impact the reliability of the bulk transmission system. The reliability authority must log each case of exceeding an interconnection reliability operating limit, and must report (to its compliance monitor) each case of exceeding an interconnection reliability operating limit for a time greater than or equal to T<sub>v</sub>. Note that T<sub>v</sub> may be zero.</p>
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The definitions for “Documentable Interconnection Reliability Operating Limit Violation”, and Interconnection Reliability Operating Limit Violation were dropped because they are not used in the standard.

<p><u>Trans Subcommittee</u> Robert E. Reed PJM</p>		x	<p>1) All of the definitions should be cross-referenced against the Functional Model and other standards to ensure the same term has a</p>
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<p>Daniel Cooper Michigan Public Power Agency  Ken Donohoo ERCOT  Michael Gildea Duke-Energy, North America  Francis Halpin Bonneville Power Administration  Tom Mallinger Midwest ISO  Darrick Moe Western Area Power Adm  Scott Moore American Electric Power  Bill Slater Florida Power Corporation  Tom Stuchlik Western Resources  Joseph Styslinger Southern Company  David Thorne D. H. Thorne Consultants, Inc  Robert Waldele New York ISO  Roman Carter Southern Company  John Ahr Alleghany Power Systems  Susan Morris SERC  Ed Pfeiffer Ameren  Ray Palmieri ECAR  Tom Vandervort NERC</p>			<p>consistent definition. For example “Reliability Authority Area” and “Transmission Operator” within this standard is different than in the Functional Model.</p> <p>2) “Bulk Electric System” definition within this standard is a bit ambiguous. The TS knows that “Bulk Electric System” is a controversial term that has different meanings to different individuals, but a more in-depth definition is recommended (no suggestion).</p> <p>3) “Documentable Interconnection Reliability Operating Limit Violation” and “Interconnection Reliability Operating Limit Event” have identical definitions.</p> <p>4) Suggestion: “Real-time Monitoring” – Personnel are available to see and hear various real-time data sources as conditions dictate.</p>
<p>The Functional Model did not contain any definition for Reliability Authority Area.</p> <p>The definition for Transmission Operator was transposed with that for the Transmission Service Provider and this has been corrected.</p> <p>The definition for the term, “Bulk Electric System” came from the NERC Glossary, and represents the best consensus of the various NERC committees as well as the approval of the NERC BOT.</p> <p>The term Documentable IROL Violation is not used in the standard and has been dropped.</p> <p>The term, “real-time monitoring” was revised to the following: “The act of scanning data and drawing conclusions about what the data indicates.” The revised definition clearly conveys that monitoring involves more than observing – the system operator is expected to draw conclusions about the data.</p>			



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<p>Southern Company Generation &amp; Energy Mktg  Roman Carter # 5, 6  Joel Dison #5,6  Tony Reed #5,6  Lucius Burris #5,6  David Deerman #5,6  Clifford Shepard #5,6  Michael Smith #5,6  Lloyd Barnes SCGEM 5,6  Gary Miller SCGEM 5,6  Terry Crawley Southern Generation 5  Roger Green Southern Generation 5</p>		x	<p>All the definitions should be cross-referenced against the Functional Model and other Standards to ensure the same term has a consistent definition. In particular, Reliability Authority Area and Transmission Operator have different wording than the Functional Model</p>
<p>The approved Functional Model does not contain any definition for Reliability Authority Area. The latest set of proposed changes to the Functional Model did contain a draft definition for the “Reliability Authority Area” and this was used in the changes made to the standard.</p>			
<p>The definition for Transmission Operator was transposed with that for the Transmission Service Provider and this has been corrected.</p>			
<p>Gerald Rheault Manitoba Hydro #1, 3, 5, 6</p>		x	<p>Interconnection Reliability Operating Limit The first sentence is the complete definition. The rest is a description of activities related to this definition and should not be included here.</p> <p>Real-time Monitoring. This should be modified to “The act of using human vision and hearing or computer software to scan various real-time data sources and draw conclusions about what the data indicates.</p> <p>Real-time The word present time should be used instead of immediate.</p> <p>The words present or presently should be used instead of immediate or immediately in context to real-time in any definition contained in this Standard.</p> <p>Self-certification should be changed to “ A process by which an entity does a self evaluation to determine if it is compliant with the specific requirements for a reliability standard”. The rest can remain the same.</p>

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<p>The definition of IROL was revised so the explanatory information following the first sentence has been dropped.</p> <p>The suggested revision to “Real-time Monitoring” was adopted.</p> <p>The intent of the revision to “Real-time” was adopted – the new definition uses the word, ‘present’ instead of ‘immediate’. Placing the word, ‘present’ in all definitions containing the phrase, ‘real-time’ led to cumbersome phraseology and didn’t seem necessary.</p> <p>The suggested change for self-certification was adopted.</p>			
Ron Falsetti IMO #2		x	<p>Tv – This definition seems to reflect the compliance violation time frame, but the usage of the Tv term in the draft standard is the ‘maximum acceptable response time’ as determined by the RA/PA BPS (Bulk Power System) - Definition for BPS Is required Reliability Authority does not have “control” of the system, but provides direction to the asset owners/operators. Therefore, suggest the following change:</p> <p>Reliability Authority Area: A defined electrical system bounded by interconnection (tie-line) metering and telemetry under the direction of a single reliability authority.</p> <p>The definition of “Documentable Interconnection Reliability Operating Limit Violation” appears to be redundant to the definition of “Interconnection Reliability Operating Limit Event.” Suggest deletion of “Documentable Interconnection Reliability Limit Violation.”</p>
<p>T<sub>v</sub> – The definition was revised to include a reference to maximum response time. The revised definition is: “The maximum time that an IROL can be exceeded without compliance sanctions being applied“</p> <p>The term, “Bulk Power System” has been defined and was included in the last posting of the standard. This term was copied from the NERC Glossary of Terms. “A term commonly applied to the portion of an electric utility system that encompasses the electrical generation resources and bulk transmission system.”</p> <p>The term, “Reliability Authority Area” was revised to conform with the proposed definition in the latest draft changes to the Functional Model.</p> <p>The term, “Documentable Interconnection Reliability Limit Violation” was dropped from the standard.</p>			
<p>Kathleen Goodman ISO-NE #2</p> <p><u>NPCC CP9</u></p> <p>Michael Schiavone National Grid USA #1</p> <p>Roger Champagne Hydro-Quebec TransEnergie #1</p> <p>Ralph Rufrano New York Power Authority #1</p> <p>David Little Nova Scotia Power Inc. #1</p> <p>David Kiguel Hydro One Networks #1</p> <p>Michael Potishnak ISO-New England #2</p>		x	<p>NPCC (ISO-NE) feels that with respect to T<sub>v</sub> there must be an established process through which this is derived or the re-preparation time of thirty minutes should become the standard default absent such a process.</p> <p>Regarding Cascading Outages; There is no guidance on how the parameters are to be defined which would permit the identification of the local area and the widespread area. It also fails to recognize that a local area problem may evolve into a wider area problem</p>

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Barry Gee Dan Stosick Fernando Saavedra Greg Campoli	National Grid USA ISO-New England ISO-New England New York ISO	#1 #2 #2 #2			depending on the load, time of day, recent contingencies and other factors. A well-defined process for determining what is (and what is not) a reportable event is essential.
<p>Because <math>T_v</math> is a risk-based value, different RAs (or Regions, or Interconnections) are expected to develop their own processes for establishing <math>T_v</math>. Whatever process is developed must not violate the requirements for developing System Operating Limits established in the Determine Facility Ratings, System Operating Limits and Transfer Capabilities standard.</p> <p>The definition for Cascading Outages was adopted from the NERC Glossary of Terms.</p> <p>IROLs must be identified by the RA. Instances of exceeding IROLs for time greater than the IROL's <math>T_v</math> are reportable.</p>					
Terry Bilke	Midwest ISO			x	The "Transmission Operator" definition appears to be a definition for transmission provider. The functional model defines Transmission Operator as "Operates and maintains the transmission facilitates and executes switching orders".
<p>As noted, the definition for Transmission Operator was transposed with that for the Transmission Service Provider – and this has been corrected.</p>					

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**Do you agree with the SDT that the redundant requirements for the Transmission Operator should be deleted from this standard?**

**Summary Consideration:** Most commenters agreed with the elimination of the redundant TOP requirements. The SDT sent a request to the Director-Standards, asking that action be taken to determine if another SAR is needed to address system operating limits that are not included in this standard. This request was forwarded to the Operating Committee for their consideration. If this standard is approved and is implemented prior to RA Certification, each control area would be responsible for compliance with this standard.

Commenter	Yes	No	Comments
Stuart Goza TVA #1	x		This standard should be modified to specify non-redundant requirements for the TO responsibilities for operating within system operating limits or a separate standard created for this issue.
The SDT sent a letter to the Director-Standards recommending that action be taken to review the need for a separate standard that addresses operating within system operating limits.			
Gerald Rheault Manitoba Hydro #1, 3, 5, 6	x		The responsibility for monitoring IROLs, addressed in this Standard, rests with the Reliability Authority as defined in the Functional Model. However Manitoba Hydro believes there is also a reliability requirement to monitor real-time operations for all other system operating limits (SOL) which are not identified as IROLs. If it is not appropriate to include these monitoring requirements in this Standard, then another Standard should be created to address this requirement.
The SDT sent a letter to the Director-Standards recommending that action be taken to review the need for a separate standard that addresses operating within system operating limits.			
Tony Jankowski We Energies #4	x		Comments: The Transmission Operator should have operating performance requirements developed in another Standard.
The SDT sent a letter to the Director-Standards recommending that action be taken to review the need for a separate standard that addresses operating within system operating limits.			
<u>SERC Operations Planning Subcommittee</u> Carter Edge SEPA #4, 5 William Gaither So Carolina Pub Serv Auth #1 Mike Miller Southern Co #1	x		This should not preclude the Transmission Operator from conducting independent analysis.

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Roger Brand Muni Elec Auth GA #1 Phil Creech Progress Energy – CP&L #1 Gene Delk So Carolina Elec & Gas #1 Al McMeekin So Carolina Elec & Gas #1 Greg Ott Alcoa-Yadkin #1 Doug Newbaue GA System Operations #1 Mike Clements TVA #1 Don Reichenbach Duke Energy #1 Lynna Estep SERC #2 Mark Creech TVA #1			
<b>Agreed. There is nothing in this standard that precludes the Transmission Operator from conducting independent (or coordinated) analyses.</b>			
Ken Githens Allegheny Energy Supply	x		AE agrees that two organizations controlling the same limit is not productive.
<b>This was the consensus of the comments submitted by industry participants.</b>			
William Smith Allegheny Power #1	x		
<u>NPCC CP9</u> Michael Schiavone National Grid USA #1 Roger Champagne Hydro-Quebec TransEnergie #1 Ralph Rufrano New York Power Authority #1 David Little Nova Scotia Power Inc. #1 David Kiguel Hydro One Networks #1 Michael Potishnak ISO-New England #2 Barry Gee National Grid USA #1 Dan Stosick ISO-New England #2 Fernando Saavedra ISO-New England #2 Greg Campoli New York ISO #2	x		
Kathleen Goodman ISO-NE #2	x		
Albert DiCaprio MAAC #2	x		
Alan Johnson Mirant Americas Energy Mktg #6	x		
Mark Heimbach PPL Generation #6	x		

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<p><u>Trans Subcommittee</u>          Robert E. Reed PJM          Daniel Cooper Michigan Public Power Agency          Ken Donohoo ERCOT          Michael Gildea Duke-Energy, North America          Francis Halpin Bonneville Power Administration          Tom Mallinger Midwest ISO          Darrick Moe Western Area Power Adm          Scott Moore American Electric Power          Bill Slater Florida Power Corporation          Tom Stuchlik Western Resources          Joseph Styslinger Southern Company          David Thorne D. H. Thorne Consultants, Inc          Robert Waldele New York ISO          Roman Carter Southern Company          John Ahr Alleghany Power Systems          Susan Morris SERC          Ed Pfeiffer Ameren          Ray Palmieri ECAR          Tom Vandervort NERC</p>	<p>x</p>		
<p><u>Operating Reliability Working Group SPP</u>          Gerry Burrows KCP&amp;L #1          Bob Cochran SPS #1          Peter Kuebeck OG&amp;E #1          Scott Moore AEP #1          Tom Stuchlik Westar #1          Dan Boezio AEP #1          Matt Bordelon CLECO #1          Mike Crouch WFEA #1          Mike Gammon KCP&amp;L #1          Kevin Goolsby SPP #2          Bo Jones Westar #1          Allen Klassen Westar #1          Thad Ness AEP #1</p>	<p>x</p>		

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Harold Wyble KCP&L #1 Robert Rhodes SPP #2			
Alan Boesch NPPD #1	x		
Kathleen Goodman ISO-NE #2	x		
Carter Edge SEPA #4, 5	x		
Dan Boezio & Raj Rana AEP #1, 3, 5, 6	x		
Raymond Mammarella PPL Elec Util #1	x		
Tom Pruitt Duke Power #1	x		
Robert Grover PPL Elec Util #3	x		
FRCC Op, Eng & Mkt Int Linda Campbell FRCC #2 Paul Elwing Lakeland Electric # 3 John Shaffer FPL #1 Bob Remley Clay Elec Coop #4 Patti Metro FRCC #2 Eirc Grant Progress Energy – FL #1 Joe Roos Ocala Electric Utility #3 Joe Krupar FL Muni Pwr Agency #3 Richard Gilbert Lakeland Electric #3 Bill Slater Progress Energy – FL #1 Amy Long Lakeland Electric #1 Roger Westphal Gainesville Regional Util #5 Bob Goss SEPA #5 Steve Wallace Seminore Electric Coop #4 Ted Hobson JEA #1	x		
Peter Burke ATC #1	x		
MAAP Ops Subcommittee #2 Llyod Linke MAPP Allan Silk Manitoba Hydro Paul Brune NPPD Tod Gosnell Omaha Public Pwr Dist Paul Koskela Minnesota Pwr Larry Larson Otter Tail Power Derrick Moe WAPA	x		

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Dick Pursley Great River Energy Martin Trencle Xcel Energy Joseph Knight MAPPCOR			
John Horakh MAAC #2	x		
<u>BPA Adm TBL #1</u> James Murphy Mike Viles James Randall Al Johnson Jeff Newby Jim Gronquist Sylvia Wiggerhaus Brian Tuck Dick Spence Tracy Rolstad Steve Hitchens	x		
Darrell Richardson Illinois Power #1, 3	x		
David Thorne Pepco #1	x		
<u>Centerpoint Energy #1</u> Richard Sikes John Jonte Wayne Kemper Glenn Hemperley Brad Calhoun	x	x	We agree with removing redundancy, but not coordination.
<p>The SDT sent a letter to the Director-Standards recommending that action be taken to review the need for a separate standard that addresses operating within system operating limits. In turn, the Director-Standards informed the NERC Operating Committee (OC) and asked that the OC initiate action to determine if an additional SAR is needed.</p> <p>Coordination between RAs is being addressed in the Coordinate Operations Standard. During the development of the Coordinate Operations SAR, the consensus of the comments submitted indicated that the Coordinate Operations Standard should focus on RA to RA coordination. The SAR DT sent a letter to the Director-Standards recommending that action be taken to review the need for a separate standard that addresses the coordination between an RA and its underlying functions – and to address the coordination between TOPs.</p>			
Michael Sidiropoulos Pacificorp		x	Page 3, paragraph 3 says: “Exceeding a system operating limit associated with the local network integrity is important, but is not likely, by itself, to put the interconnection at risk of instability, uncontrolled separation or cascading outages”. Considering the events leading to the recent blackout, this section may have to be revised. Suggestion: allow a system to exceed local operating limits only if a controlled islanding scheme is in place, which can be shown to prevent cascading for the operating condition in question.



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<p>While the results of the blackout investigation have not been published, it doesn't seem likely that the blackout was the result of exceeding an individual system operating limit. However, even before the August 14 blackout, there was concern that this standard may not have a broad enough scope and the SDT sent a letter to the Director-Standards recommending that action be taken to review the need for a separate standard that addresses operating within system operating limits. In turn, the Director-Standards informed the NERC Operating Committee (OC) and asked that the OC initiate action to determine if an additional SAR is needed.</p> <p>There is another standard called, "Design, Install, and Coordinate Control and Protection Systems" that addresses system protection.</p>				
John Blazekovich	Exelon Corp	#1, 3, 5, 6	<p>x</p> <p>Based on recent events of August 14, 2003 Exelon Corporation is not as confident as the SAR authors in stating, "Exceeding a system operating limit associated with the local network integrity is important, but is not likely, by itself, to put the interconnection at risk of instability, uncontrolled separation or cascading outages". We ask that this Standard be put on "hold" until investigations are completed and root cause has been established.</p> <p>Exelon Corporation feels that ultimately the reliability of the interconnection lies with the Reliability Authority, but Transmission Operators should not be eliminated from contributing/participating in actions that enhance reliability.</p>	
<p>While the results of the blackout investigation have not been published, it doesn't seem likely that the blackout was the result of exceeding an individual system operating limit. However, even before the August 14 blackout, there was concern that this standard may not have a broad enough scope and the SDT sent a letter to the Director-Standards recommending that action be taken to review the need for a separate standard that addresses operating within system operating limits. In turn, the Director-Standards informed the NERC Operating Committee (OC) and asked that the OC initiate action to determine if an additional SAR is needed.</p>				
Southern Co Transmission Planning #1			x	<p>It is not clear to us that the Transmission Operator would never be responsible for performing the requirements included in this standard. Similar to Standard 600, this requirement could apply to "the areas for which they are responsible".</p>
Todd Lucas	Southern Co			
Joe Payne	Mississippi Power Company			
Travis Koval	Southern Co			
Bill Pope	Gulf Power Company			
John Clark	Southern Co			
David Johnson	Savannah Electric			
Mike Miller	Southern Co			
Jim Griffith	Southern Co			
Monroe Landrum	Southern Co			
<p>The Functional Model is built on the assumption that there is one function with ultimate responsibility for each reliability-related activity, and the Functional Model assigns the RA the responsibility for establishing reliability limits. The RA can delegate this responsibility to TOPs, but even if the RA delegates this responsibility, the RA would be held responsible for compliance with the requirement. The SDT was also concerned about completely removing the requirements for the TOP, and sent a letter to the Director-Standards recommending that action be taken to review the need for a separate standard that addresses operating within system operating limits. In turn, the Director-Standards informed the NERC Operating Committee (OC) and asked that the OC initiate action to determine if an additional SAR is needed.</p>				

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Ed Davis Entergy Services #1	x	<p>Given the significant changes to this draft standard, the RA is now monitoring the facilities with identified and documented IROLs. We do not agree with this blanket statement until we are able to review all the requirements of all the functional entities. For instance, this draft standard does not recognize that the TO has fiduciary responsibility to his stockholders' and lending institutions' investments and that neither NERC standards, nor the Functional Model, can take that responsibility and liability away. This fiduciary responsibility requires the TO establish thermal ratings, and associated Tv, for its equipment and then monitor that equipment. If those thermal ratings are the lesser of the thermal, stability or voltage limits, then the TO has established the IROL limit. Therefore, we suggest the requirements identified in this standard are not redundant requirements but are requirements met by several entities (functions), not met by one entity (function).</p> <p>Also, the requirements should be changed to the TO, from the TOP. The TO may delegate some parts of that function to another entity, at the TO's option. However, for the purposes of this standard, the Transmission Owner must be added to all parts of this standard. In addition, what functional entity is monitoring all the transmission facilities with system operating limits not included in the IROLs? What functional entity is monitoring all the other transmission facilities? The answer is that the TO, and maybe the TOP, must be added to the list of entities (functions) monitoring the real-time system to ensure all the transmission facilities are being operated within limits.</p> <p>If the TO is not added to this standard, then there is a major piece missing to the monitoring of the power system and the reliability of the system. That missing piece is the monitoring of the system operating limits.</p> <p>Therefore, another standard needs to be written with a title something like – "Operate Within Limits – All Transmission and System Operating Limits Other Than Interconnection Reliability Operating Limits".</p>
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<p>The Determine Facility Ratings, System Operating Limits and Transfer Capabilities Standard addresses the development of both facility ratings and system operating limits. This standard requires that the equipment owners establish facility ratings, and that the facility ratings be respected in the development of system operating limits.</p> <p>The Functional Model assigned responsibility for establishing facility ratings with equipment owners (Generator Owners and Transmission Owners) – and assigned the responsibility for establishing reliability limits to the RA and limits associated with local networks to the TOP.</p> <p>The Functional Model does not preclude the delegation of activities from the RA to other functions. However, the Functional Model is built on the assumption that there is one function with ultimate responsibility for each reliability-related activity, and the Functional Model assigns the RA the responsibility for establishing reliability limits. The RA can delegate this responsibility to TOPs, but even if the RA delegates this responsibility, the RA would be held responsible for compliance with the requirement. The SDT was also concerned about completely removing the requirements for the TOP, and sent a letter to the Director-Standards recommending that action be taken to review the need for a separate standard that addresses operating within system operating limits. In turn, the Director-Standards informed the NERC Operating Committee (OC) and asked that the OC initiate action to determine if an additional SAR is needed.</p>			
Terry Bilke	Midwest ISO #2	x	<p>There should be some responsibilities for both RA (present day Reliability Coordinator) and the Transmission Operator. They aren't necessarily the same requirements.</p> <p>The TO-RA relationship is akin to the pilot-air traffic controller relationship. Both monitor some common items. In general, one view is local, the other is broader and at a higher level. Both have a responsibility for air safety.</p>
<p>None of the 'Set of 11 Standards' addresses the coordination that takes place between the RA and the TOP. The Coordinate Operations SAR DT sent a letter to the Director-Standards asking that the NERC Operating Committee be informed of this omission, and investigate the need for an additional SAR.</p>			

**Consideration of Comments on 2<sup>nd</sup> Posting of Operate Within Interconnection Reliability Operating Limits Standard  
Comments on Definitions**

<p>Southern Company Generation &amp; Energy Mktg                  Roman Carter # 5, 6                  Joel Dison #5,6                  Tony Reed #5,6                  Lucius Burris #5,6                  David Deerman #5,6                  Clifford Shepard #5,6                  Michael Smith #5,6                  Lloyd Barnes SCGEM 5,6                  Gary Miller SCGEM 5,6                  Terry Crawley Southern Generation 5                  Roger Green Southern Generation 5</p>		x	<p>It would be appropriate to leave the requirements for the Transmission Operator in the Standard as long as it is better clarified that the Transmission Operator is responsible for the local network system and not duplicating the Reliability Authority’s responsibility for the overall Bulk electric system.</p> <p>Furthermore, the comment on page 3, third paragraph in the Comment Form, <u>“Exceeding a system operating limit associated with the local network integrity is important, but is not likely, by itself, to put the interconnection at risk of instability, uncontrolled separation or cascading outages”</u> may need to be reworded or possibly removed in light of the recent Blackout. Does Local Network Integrity need to be addressed in a Standard itself?</p>
<p>The scope of the SAR included the following language that seemed to preclude including limits associated with local networks. “This standard requires adherence to established operating limits<sup>3</sup> identified to prevent instability, uncontrolled separation or cascading outages that adversely impact the reliability of the bulk transmission system. “ Even before the August 14 blackout, the SDT was concerned about that the scope of the standard may not be comprehensive enough, and an additional SAR may be needed. The SDT sent a letter to the Director-Standards recommending that action be taken to review the need for a separate standard that addresses operating within system operating limits. In turn, the Director-Standards informed the NERC Operating Committee (OC) and asked that the OC initiate action to determine if an additional SAR is needed.</p>			
<p>Susan Morris SERC #2                  Bill Reinke SERC #2                  Sam Stryker Fayettevill PWC #3, 4, 5                  Carter Edge SEPA #4, 5                  Bill Thompson Dominion Trans #1</p>		x	<p>This should not preclude the Transmission Operator(s) from conducting independent analysis.</p> <p>This draft standard does not recognize that the TO has fiduciary responsibility for its owned facilities and neither NERC standards, nor the Functional Model, can take that responsibility and liability away. This fiduciary responsibility requires the TO to establish thermal ratings, and associated Tv, for its equipment and then monitor that equipment. If those thermal ratings are the lesser of the thermal, stability or voltage limits, then the TO has established the IROL limit. Therefore, we suggest the requirements identified in this standard are not redundant requirements but are requirements met by several entities (functions), not met by one entity (function).</p> <p>It should also be acknowledged that entities such as the RA and the TO(s) may delegate their respective monitoring responsibilities to the TOP.</p>

<sup>3</sup> These are the limits established through the standard, “Determine Facility Ratings, Operating Limits and Transfer Capabilities”

**Consideration of Comments on 2<sup>nd</sup> Posting of Operate Within Interconnection Reliability Operating Limits Standard  
Comments on Definitions**

		<p>The following is an excerpt from page three of this document: <i>“This reliability standard focuses on the subset of system operating limits that, if exceeded, could cause instability, uncontrolled separation or cascading outages that adversely impact the reliability of the bulk transmission system and is clearly under the responsibility of the Reliability Authority.”</i> For Tos/TOPs, system operating limits should not include only those limits which have been identified as leading to cascading outages, instability, or uncontrolled separation. This is a major issue in terms of the scope. As conceived, this standard does not result in any entity assuring that bulk power system is operating within limits. It only results in operating within those limits for which violations result in instability/cascading outage risk. Any defined operating limit, which has been identified as potentially threatening bulk reliability and thereby requiring consistent monitoring and adherence, should be covered by a standard.</p>
<p>The Determine Facility Ratings, System Operating Limits and Transfer Capabilities Standard addresses the development of both facility ratings and system operating limits. This standard requires that the equipment owners establish facility ratings, and that the facility ratings be respected in the development of system operating limits.</p> <p>The Functional Model assigned responsibility for establishing facility ratings with equipment owners (Generator Owners and Transmission Owners) – and assigned the responsibility for establishing reliability limits to the RA and limits associated with local networks to the TOP.</p> <p>The Functional Model does not preclude the delegation of activities from the RA to other functions. However, the Functional Model is built on the assumption that there is one function with ultimate responsibility for each reliability-related activity, and the Functional Model assigns the RA the responsibility for establishing reliability limits. The RA can delegate this responsibility to TOPs, but even if the RA delegates this responsibility, the RA would be held responsible for compliance with the requirement. The SDT was also concerned about completely removing the requirements for the TOP, and sent a letter to the Director-Standards recommending that action be taken to review the need for a separate standard that addresses operating within system operating limits. In turn, the Director-Standards informed the NERC Operating Committee (OC) and asked that the OC initiate action to determine if an additional SAR is needed.</p>		

**Draft Comments and Considerations for 2<sup>nd</sup> Posting for Operate Within IROLs Standard  
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**Notifying the Compliance Monitor – Include in standard or in a Compliance Enforcement Program (CEP) Document**

**Summary Consideration:** Most commenters indicated a preference for keeping this in the standard, so the references were kept in the revised standard.

Commenter	Std	CEP	Comments
Terry Bilke Midwest ISO #2	x		There does not appear to be a need to make submissions within 5 business days. It may take a while to sort out a problem.
The intent in selecting 5 business days was to select a timeframe that would be short enough so that entities wouldn't forget about the situation, yet long enough that entities could verify that they hadn't received the data.			
Susan Morris SERC #2 Bill Reinke SERC #2 Sam Stryker Fayettevill PWC #3, 4, 5 Carter Edge SEPA #4, 5 Bill Thompson Dominion Trans #1	x		We believe that it is appropriate to include this in the standard with the comments noted in Section 205. <i>(The requirement for data collection should be tied to its impact on reliability. Requirement 1.3 should be modified to read:</i>  <i>The reliability authority shall notify its compliance monitor when an entity that has facilities monitored by the reliability authority does not provide data as specified and this lack of data has an impact on reliability.</i>  <i>Measurement 2.3.1 should be rewritten to read:</i>  <i>2.3.1. The notification shall take place within five business days of discovering that the data having an impact on reliability is missing.)</i>
The suggested change to Requirement 205 was not adopted because it would link data collection with an instance of exceeding an IROL, and that could result in a multiple sanctions for the same violation. The standards are being drafted so that there will only be a single sanction for a single violation.			
FRCC Op, Eng & Mkt Int Linda Campbell FRCC #2 Paul Elwing Lakeland Electric #3 John Shaffer FPL #1 Bob Remley Clay Elec Coop #4 Patti Metro FRCC #2 Eirc Grant Progress Energy – FL #1 Joe Roos Ocala Electric Utility #3 Joe Krupar FL Muni Pwr Agency #3 Richard Gilbert Lakeland Electric #3	x		We agree with including it in the standard because there needs to be some place for recognition of not getting the data that is needed. We are not entirely sure what steps the compliance monitor would then take, but are assuming the compliance monitor would follow up with the entity not supplying the needed information. In FRCC, if our Security Coordinator does not get the requested information, our Operating Reliability Subcommittee is informed so that follow up can take place. Ultimately, our Security Process (Reliability Plan) requires the operating entities to supply required reliability data and our ORS and OC are the back stop to ensure it is supplied.

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<p>Bill Slater Progress Energy – FL #1 Amy Long Lakeland Electric #1 Roger Westphal Gainesville Regional Util #5 Bob Goss SEPA #5 Steve Wallace Seminore Electric Coop #4 Ted Hobson JEA #1</p>			
<p><b>Notification of the Compliance Monitor is supposed to be the 'trigger' for an 'investigation upon complaint'.</b></p>			
<p><u>Operating Reliability Working Group SPP</u> Gerry Burrows KCP&amp;L #1 Bob Cochran SPS #1 Peter Kuebeck OG&amp;E #1 Scott Moore AEP #1 Tom Stuchlik Westar #1 Dan Boezio AEP #1 Matt Bordelon CLECO #1 Mike Crouch WFEC #1 Mike Gammon KCP&amp;L #1 Kevin Goolsby SPP #2 Bo Jones Westar #1 Allen Klassen Westar #1 Thad Ness AEP #1 Harold Wyble KCP&amp;L #1 Robert Rhodes SPP #2</p>	<p>x</p>		<p>This standard does not require the reliability authority to notify those entities not providing data to remind those entities that they should be providing data. The reliability authority should be trying to obtain the missing data and working to resolve differences that prevent delivery of the data. If the reliability authority and the responding entity cannot reach agreement on data delivery, then the reliability authority should notify the compliance monitor.</p>
<p><b>Agreed – this standard does not require the RA to provide a reminder to those entities that need to provide data. This does not preclude the RA from providing such a reminder.</b></p>			
<p><u>MAAP Ops Subcommittee #2</u> Llyod Linke MAPP Allan Silk Manitoba Hydro Paul Brune NPPD Tod Gosnell Omaha Public Pwr Dist Paul Koskela Minnesota Pwr Larry Larson Otter Tail Power Derrick Moe WAPA Dick Pursley Great River Energy</p>	<p>x</p>		<p>Relaying on a centralized compliance document would result in a compliance document that could never be stabilized due to too many changes being required.</p>

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Martin Trencé Xcel Energy Joseph Knight MAPP COR			
The CEP is likely to undergo some changes as a result of the new committee structure – and one of those changes may be increased standardization in the implementation of the Regional Compliance Programs. If this happens, this procedure could be revised so that the same requirement doesn't appear in multiple documents.			
Stuart Goza TVA #1	x		
<u>NPCC CP9</u> Michael Schiavone National Grid USA #1 Roger Champagne Hydro-Quebec TransEnergie #1 Ralph Rufrano New York Power Authority #1 David Little Nova Scotia Power Inc. #1 David Kiguel Hydro One Networks #1 Michael Potishnak ISO-New England #2 Barry Gee National Grid USA #1 Dan Stosick ISO-New England #2 Fernando Saavedra ISO-New England #2 Greg Campoli New York ISO #2	x		
Gerald Rheault Manitoba Hydro #1, 3, 5, 6	x		
Kathleen Goodman ISO-NE #2	x		
Peter Burke ATC #1	x		
Alan Boesch NPPD #1	x		
Carter Edge SEPA #4, 5	x		
Tony Jankowski We Energies #4	x		
Michael Sidiropoulos Pacificorp	x		
<u>BPA Adm TBL #1</u> James Murphy Mike Viles James Randall Al Johnson Jeff Newby Jim Gronquist Sylvia Wiggerhaus Brian Tuck Dick Spence Tracy Rolstad Steve Hitchens	x		
Ed Davis Entergy Services #1	x		
Alan Johnson Mirant Americas Energy Mktg #6	x		
<u>SERC Operations Planning Subcommittee</u> Carter Edge SEPA #4, 5	x		



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William Gaither So Carolina Pub Serv Auth #1 Mike Miller Southern Co #1 Roger Brand Muni Elec Auth GA #1 Phil Creech Progress Energy – CP&L #1 Gene Delk So Carolina Elec & Gas #1 Al McMeekin So Carolina Elec & Gas #1 Greg Ott Alcoa-Yadkin #1 Doug Newbaue GA System Operations #1 Mike Clements TVA #1 Don Reichenbach Duke Energy #1 Lynna Estep SERC #2 Mark Creech TVA #1			
Dan Boezio & Raj Rana AEP #1, 3, 5, 6		x	We would encourage the Reliability Authority to work with the entities not providing the specified data and try to resolve the dispute prior to reporting the issue to the Compliance Monitor. Additionally, we believe the requirement for the Reliability Authority to notify the Compliance Monitor does not need to be contained within this standard.
<b>The standard was revised to include the provision that the RA only notify its compliance monitor if it is unable to resolve an issue involving data not being provided as specified.</b>			
William Smith Allegheny Power #1		x	
Raymond Mammarella PPL Elec Util #1		x	
Tom Pruitt Duke Power #1		x	
Ken Githens Allegheny Energy Supply #5		x	
James Horakh MAAC #2		x	
Darrell Richardson Illinois Power #1, 3		x	
Robert Grover PPL Elec Util #3		x	
<u>Southern Co Transmission Planning #1</u> Todd Lucas Southern Co Joe Payne Mississippi Power Company Travis Koval Southern Co Bill Pope Gulf Power Company John Clark Southern Co David Johnson Savannah Electric Mike Miller Southern Co Jim Griffith Southern Co		x	

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Monroe Landrum Southern Co			
David Thorne Pepco #1		x	
Albert DiCaprio MAAC #2		x	
Mark Heimbach PPL Generation #6		x	
<u>Trans Subcommittee</u>		x	
Robert E. Reed PJM			
Daniel Cooper Michigan Public Power Agency			
Ken Donohoo ERCOT			
Michael Gildea Duke-Energy, North America			
Francis Halpin Bonneville Power Administration			
Tom Mallinger Midwest ISO			
Darrick Moe Western Area Power Adm			
Scott Moore American Electric Power			
Bill Slater Florida Power Corporation			
Tom Stuchlik Western Resources			
Joseph Styslinger Southern Company			
David Thorne D. H. Thorne Consultants, Inc			
Robert Waldele New York ISO			
Roman Carter Southern Company			
John Ahr Alleghany Power Systems			
Susan Morris SERC			
Ed Pfeiffer Ameren			
Ray Palmieri ECAR			
Tom Vandervort NERC			

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<u>Southern Company Generation &amp; Energy Mktg</u> Roman Carter # 5, 6 Joel Dison #5,6 Tony Reed #5,6 Lucius Burris #5,6 David Deerman #5,6 Clifford Shepard #5,6 Michael Smith #5,6 Lloyd Barnes SCGEM 5,6 Gary Miller SCGEM 5,6 Terry Crawley Southern Generation 5 Roger Green Southern Generation 5		x	
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**Other Comments**

Commenter	Comments
Terry Bilke Midwest ISO #2	In general, the level of compliance violation should be proportional to its impact on reliability (not the size of the entity).
<b>Agreed. The new compliance committees intend to address that issue.</b>	
Ron Falsetti IMO #2	A further concern with the draft is the continuing difficulty of defining wide area impact versus local impact. There is no guidance on how the parameters are to be defined which would permit the identification of the local area and the widespread area. It also fails to recognize that a local area problem may evolve into a wider area problem depending on the load, time of day, recent contingencies and other factors. A well defined process for determining what is (and what is not) a reportable event is essential.
<b>A definition for Wide Area Impact has been developed.</b>	
Stuart Goza TVA #1	Please note that throughout the standard the Tv term is used but is not formatted the same (Tv vs. T <sub>v</sub> ). This is a minor, formatting issue, but should be consistent throughout to reduce confusion.
<b>Agreed. We will try to do a better job of proofing before posting.</b>	
<u>Compliance Subcommittee</u>	<p>The document has been written in a manner that meets many of the concerns we had with the first draft.</p> <p>The key compliance issues that should be measures are captured in 202, 203 and 204. (The other measures, identifying the elements, data collection, data provision, action plan, and RA Directives are important as supporting requirements but do not require a compliance structure. Suggest that the certification process should spell out the policies, procedures and processes, reporting relationships and data collection requirements.)</p> <p>There are some concerns with the Compliance levels, and the CS and CRS will discuss that in Charleston, September 8 and 9.</p>
<b>Most of the processes, procedures and tools needed to support this standard are included in the RA Certification SAR and should not be duplicated in this standard.</b>	
<b>The standards development process requires that comments be submitted during the open posting periods. Comments submitted after the public posting periods are inappropriate and are outside this process.</b>	
Kathleen Goodman ISO-NE #2  <u>NPCC CP9</u> Michael Schiavone National Grid USA #1	1. NPCC (ISO-NE) is adamantly opposed to monetary sanctions and feels letters of increasing severity are a more effective compliance tool for ensuring adherence to standards.

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<p>Roger Champagne Hydro-Quebec TransEnergie #1  Ralph Rufrano New York Power Authority #1  David Little Nova Scotia Power Inc. #1  David Kiguel Hydro One Networks #1  Michael Potishnak ISO-New England #2  Barry Gee National Grid USA #1  Dan Stosick ISO-New England #2  Fernando Saavedra ISO-New England #2  Greg Campoli New York ISO #2</p>	<ol style="list-style-type: none"> <li>2. NPCC (ISO-NE) also feels there is a lack of coordination between the standard drafting teams and has noted instances where one team felt an issue was addressed in a separate standard to later learn it was not. As an example, with respect to the Balancing Resources standard, transmission overloads that are caused by poor control are not covered by this standard unless they reach a high level IROL. It later was identified that where this was thought to have been covered, the Operate Within Limits Standard, it was not. We would suggest that there be technical oversight as we go forward with these processes to ensure there are no “gaps” or critical reliability issues that are not addressed in the resultant standards.</li>   <li>3. Establishment of the IROL should be done in the Facility Rating Standard because that is the standard that establishes Operating Limits otherwise the wording of the title should be changed to Establish IROL and Operate within Limits.</li>   <li>4. From a global perspective it might be a prudent action to place the NERC RS development in a moratorium until the investigation into the blackout cause is completed and determinations have been made. There could be new Reliability issues that need to be captured in the developing RS that need to be incorporated into the upcoming draft RS.</li>   <li>5. NPCC (ISO-NE) seeks explanation for drawing the line at addressing only instability, cascading outages and separation. For example, what standard, if any, will address the scenario where an entity operates their system to cause a sizable thermal overload on a transmission line in another entity’s system. (e.g. a transmission line burns down if the affected entity does not take corrective action)</li> </ol>
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1. Developing and modifying the sanctions table is outside the scope of the SDT.
2. Because these standards are being developed in parallel, and because each standard's development is guided by industry comments, it is not possible to 'guarantee' that the standards will not have 'gaps' that may need to be addressed through the submission of additional SARs to add or revise requirements. An oversight committee would not be able to 'add' any requirements to the standards – all work must be done in an open process. Where the SDTs identify gaps, they notify the Director-Standards, and the Director-Standards notifies the appropriate NERC committee. The Director-Standards has already sent notices to the Resources Subcommittee and the Operating Committee regarding possible gaps in the proposed standards.
3. IROLs are a subset of system operating limits and must be developed according to the Determine Facility Ratings, System Operating Limits and Transfer Capabilities Standard. Either standard could have addressed the development of IROLs, and as long as the compliance elements are only in one standard, no harm is done by including the identification of the IROLs in this standard.
4. The standards being developed can be revised, if needed. Unless the BOT notifies the SAC and the Director-Standards that they should curtail work on these standards, development will move forward.
5. The SAR's purpose defined the scope of this standard. The SDT sent a letter to the Director-Standards asking that consideration be given to the development of another SAR that addresses other system operating limits. The Director-Standards sent the request to the Operating Committee for its action.

Southern Co Transmission Planning #1

Todd Lucas     Southern Co  
 Joe Payne     Mississippi Power Company  
 Travis Koval   Southern Co  
 Bill Pope     Gulf Power Company  
 John Clark     Southern Co  
 David Johnson   Savannah Electric  
 Mike Miller     Southern Co  
 Jim Griffith     Southern Co  
 Monroe Landrum     Southern Co

This standard should not be brought to ballot until the Planning Authority is defined in the Functional Model since the Planning Authority is assigned requirements in this standard.

The standard was revised and there aren't any requirements assigned to the Planning Authority.

Richard Sikes   CenterPoint Energy #1

We are not convinced of the need for changing from Operations Security Limit and whether there was sufficient thought given to the implications of this change. There is some thought that a mention of coordination between the Reliability Authority and Transmission Operator is redundancy. We do not agree with this concept, but we do agree with removing redundancy. We believe that any action plans regarding the mitigation of events should be a coordinated effort between the Reliability Authority and Transmission Operator.

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Here is the history on the new term IROL: The Board of Trustees asked the Director-Compliance to investigate the reason(s) why there appeared to be an increase in the number of OSL violations. The investigation showed that there was no common understanding of what constituted an OSL violation. The OLDTF formed to conduct this investigation concluded that developing a new term with a more understandable definition would minimize confusion and may lead to greater consistency in reporting OSL-type violations. The OLDTF asked the SDT to adopt as much of their work as possible, including the new term. The SDT modified the OLDTF's term to clarify that these limits are not the same as the frequency limits being proposed by the Balance Resources and Demand SDT. Hence the change from IRL to IROL.

Coordination between the RA and the TOP was never a topic included in this standard – it was proposed for inclusion in another standard, similar to the draft standard under development called, "Coordinate Operations". The Coordinate Operations standard is focused on the coordination that takes place between RAs – and doesn't address the coordination that needs to take place between an RA and its supporting functions – and the Coordinate Operations Standard doesn't address the coordination that takes place between TOPs. The Coordinate Operations SAR DT sent a letter to the Director-Standards asking that these 'gaps' be addressed – and the Director-Standards informed the Operating Committee so that it can take action to investigate and submit SAR(s).

This standard does include the following specific language: "The plan shall identify and be coordinated with those entities responsible for acting and with those entities impacted by such actions. "

<p>Susan Morris SERC #2          Bill Reinke SERC #2          Sam Stryker Fayettevill PWC #3, 4, 5          Carter Edge SEPA #4, 5          Bill Thompson Dominion Trans #1</p>	<ol style="list-style-type: none"> <li>1. Please note that throughout the standard the Tv term is used but is not formatted the same (Tv vs. T<sub>v</sub>). This is a minor, formatting issue, but should be consistent throughout to reduce confusion.</li> <li>2. Two definitions should be changed based on our comments:             <ul style="list-style-type: none"> <li>- Reliability Authority Area: A defined electrical system bounded by interconnection (tie -line) metering and telemetry <b>monitored by</b> a single reliability authority.</li> <li>- Tv: The violation time associated with a limit that is determined by the Transmission Owner(s) for equipment-based limits and by the Reliability Authority and the Planning Authority(ies) for system-based limits.</li> </ul> </li> <li>3. We are becoming increasingly concerned about this standard development process. This and other standards are being developed based on certain definitions and assumptions contained in the Functional Model. These "standards" will become fixed such that the industry will be held accountable to and measured by these standards. However, the Functional Model and the definitions contained in that revised model are changing and will not necessarily be the same as those used to develop the standards. What is the process for reviewing, revising and implementing changes to the Functional Model, and the impact of those changes on all these standards that have been developed based on the old Functional Model? Are the changes to the Functional Model being vetted by all industry participants before implementation? What is the process to revise these standards prior to</li> </ol>
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	implementing changes to the Functional Model?
<p>1. Agreed. We will try to do a better job of proofing before posting.</p> <p>2. The Reliability Authority Area definition was modified to reflect the intent of your suggestion, but the word, "direct" was used rather than monitor.</p> <p>3. The change to Tv was not made, because this does not conform with the delineation between facility limits and system operating limits established in the Determine Facility Ratings, System Operating Limits and Transfer Capabilities standard (DFR Standard). In the DFR standard, the facility owners establish facility ratings, and provide these ratings to the RA, TOP and PA. The RA, TOP and PA have responsibility for establishing System Operating Limits that respect the Facility Ratings already established. While a facility rating may have a time component associated with it, this is not the same time component used by the RA when a system operating limit is labeled an IROL. The Tv associated with the IROL must respect the time component established by the facility owner, but the Tv may be shorter than the time component associated with the facility rating.</p> <p>4. Addressing comments about the need to clarify the Functional Model are beyond the scope of the SDT. You are encouraged to bring your concerns to the attention of the Functional Model Review Task Group.</p>	
Gerald Rheault Manitoba Hydro #1, 3, 5, 6	A NERC standard is a form of legal document – it spells out the standards, the measurements, the levels of compliance and the penalties for non-compliance. As such, there should be no ambiguity, so any term defined by NERC should be clearly identified in the standard (capitalized, bold, etc.) where it is used as a defined term, or NERC must certify that all uses of a defined word are a reference to the defined term.
<p>NERC's Vice President and Legal Counsel is responsible for making the final decision on the format of these new standards, and initially he did not support the practice of capitalizing defined terms. Over the past several months there have been so many comments submitted on SARs and draft Standards requesting that defined terms be capitalized, that this practice of capitalizing defined terms is being supported. In the revised standard, defined terms have been capitalized.</p>	
<p><u>FRCC Op, Eng &amp; Mkt Int</u>  Linda Campbell FRCC #2  Paul Elwing Lakeland Electric # 3  John Shaffer FPL #1  Bob Remley Clay Elec Coop #4  Patti Metro FRCC #2  Eirc Grant Progress Energy – FL #1  Joe Roos Ocala Electric Utility #3  Joe Krupar FL Muni Pwr Agency #3  Richard Gilbert Lakeland Electric #3  Bill Slater Progress Energy – FL #1  Amy Long Lakeland Electric #1  Roger Westphal Gainesville Regional Util #5</p>	<p>1. On the first page, the SDT has identified an "Effective Period". By using the term period, it implies that there will be an end time when the standard will no longer apply. Would it be more appropriate to just state an effective date?</p> <p>2. In the applicability paragraph, the SDT has referenced the functional model approved by the BOT in June 2001. This reference causes concern. We understand that including this reference and date identifies the version of the functional model so that the understanding of the functions are based on this particular document. But, what happens when the BOT approves a change to the model at a later date? Do we now have standards based on one set of functions or understanding of functions that are different than what is in the latest functional model? This will certainly cause confusion in the industry. But, on the other hand, if you remove the date reference, then anytime the BOT changes the model, they are effectively changing the standard without going through the SAR process. We do not want the BOT to be able to change who the standards apply to without going through due process either. How do we deal with this situation?</p>



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<p>Bob Goss SEPA #5          Steve Wallace Seminore Electric Coop #4          Ted Hobson JEA #1</p>	<p>3. In the comment box on this first page, the SDT has stated that the terms BA, RA etc really apply to the entities performing the functions identified in the functional model. We understand and appreciate why the team did this, however, there is still a lot of confusion about functions vs entities in the functional model. We would suggest that the standard include the extra words to make this distinction. For example, in 1.1 of standard 201, it should read "The entities performing the reliability authority and planning authority functions shall.." This seems trivial, but we believe it is very important in helping the industry understand the functional model and how the standards apply to the entities performing the functions.</p> <p>4. Just a note for future comment forms, please provide a comment box after every question, not just at the end of the section on a particular standard. That way the comments and yes/no answers could be kept together.</p>
<p>1. Effective Date is a more appropriate phrase and has been adopted.</p> <p>2. The need for more clearly defined reliability standards is at the forefront of the push to develop new standards. There were many complaints about the lack of objectivity in the measures associated with the existing Operating Policies. If we were to wait until the Functional Model were approved before developing any new standards, we would not be achieving our goal of developing objective standards to support reliability as quickly as possible. If the Functional Model is changed and requires changes to already approved standards, then we will need to revise the standards.</p> <p>3. Phrases such as, 'the reliability authority' are being used because these are much shorter and therefore easier to read than the longer phrase, the entity performing the reliability authority function. We agree that the longer phrase is more accurate and if the Functional Model had been introduced using the longer phrases then we would also use the longer phrases. However, when the Functional Model was introduced to the industry, the shortcut phrases such as , 'the reliability authority' were used. Here is a sample sentence from page 33 of the approved version of the Functional Model: "The Purchasing-Selling Entity contacts the Generator and arranges for an energy purchase and contacts the Load-Serving Entity for the sale." If the longer version were used, this is how the same sentence would read: The entity performing the purchasing-selling entity function contacts the entity performing the generator function and arranges for an energy purchase and contacts the entity performing the load-serving entity for the sale.</p> <p>4. We've tried to experiment with different comment forms. In the past, several commenters inserted the same comment in every comment box for all comments related to a requirement. By having a single comment box for a requirement, the goal was to eliminate the need to duplicate comments.</p>	
<p>Alan Boesch NPPD #1</p>	<p>Not all System operating limits are being addressed in this standard. System operating limits in one area can be caused by the failure of another BA to balance generation and load. The RA will be getting the ACE values and should be responsible for assuring that imbalance situation does not cause a problem on the system. This situation is not addressed in the Balance Resource and Demand Standard because it allows unlimited imbalance if it is the opposite direction of frequency error. This situation needs to be addressed in a standard.</p>

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<p>This standard does not address all system operating limits. The SAR DT sent a letter to the Director-Standards asking that additional attention be paid to this omission. The Operating Committee has been informed of this 'gap' in the standards, and has been encouraged to review the situation and submit a SAR if needed.</p>	
<p>Dan Boezio &amp; Raj Rana AEP #1, 3, 5, 6</p>	<p>In each of these Standards the 'tie-in' to the Sanctions Matrix is insufficient and unclear. For example if an entity is first occurrence, level 4 non compliant to Standard 206. The penalty is a Letter (B) and \$2000 OR \$2 per MW. Which penalty is being applied the fix or variable? If it is variable, what MW is the penalty based on? The RA's load, generator rating, something else?</p> <p>We request the SDT review the levels of non-compliance and take into account the timeliness of actions or data submitted, the completeness of actions or data submitted and the quality of actions or data submitted. We believe that some of the requirements, when properly measured will lend themselves to having additional levels of non-compliance, for the ramifications of non-compliance for some of the requirements is not so severe to actually have an adverse impact on the bulk transmission system.</p>
<p>The links to the sanctions table have been added. All infractions use the letters and flat dollar fines except for a level four non-compliance for requirement 204 – exceeding an IROL for time greater than T<sub>v</sub>. For this particular violation, the following language was added: Level four non-compliance sanctions shall be the greater of the fixed dollar sanctions listed in the matrix, or the number of Megawatts above the IROL multiplied by the dollar value for the number of times non-compliant.</p> <p>In developing the levels of non-compliance, the SDT tried to consider the actual or possible impact to reliability as well as the feasibility of measurement. Many things that would be 'good' to measure such as 'quality', are nearly impossible to measure objectively.</p>	
<p>Tony Jankowski We Energies #4</p>	<p>Please provide assessment of how this Standard will work with abnormal operations and emergency restoration. How is the line drawn. Use the August 14, 2003 event as an example for determining compliance and sanctions.</p>
<p>This standard does not address abnormal conditions or emergency restoration. Those topics are being addressed in other standards, and adding links between the standards is beyond the scope of the SDT.</p>	

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<p><u>Operating Reliability Working Group SPP</u>  Gerry Burrows KCP&amp;L #1  Bob Cochran SPS #1  Peter Kuebeck OG&amp;E #1  Scott Moore AEP #1  Tom Stuchlik Westar #1  Dan Boezio AEP #1  Matt Bordelon CLECO #1  Mike Crouch WFEC #1  Mike Gammon KCP&amp;L #1  Kevin Goolsby SPP #2  Bo Jones Westar #1  Allen Klassen Westar #1  Thad Ness AEP #1  Harold Wyble KCP&amp;L #1  Robert Rhodes SPP #2</p>	<p>The performance reset period of one calendar year in 201, 202, 204 and 205 should be changed to 12 months. 206, 270 and 208 should remain 12 months.</p> <p>Areas where non-compliance is the result of a lack of proper documentation should be consistent throughout each individual standard and across all standards, especially between this standard and Standard 600, Determine Facility Ratings, System Operating Limits and Transfer Capabilities.</p>
<p>There were several commenters who suggested changes to the reset period, and the standard was revised so that all requirements in this standard have the following language: "12 months from the last violation" This change supports your recommendation.</p> <p>Changes in standards are driven by the comments submitted by the industry. A lack of proper documentation in one standard is not necessarily the same as in another standard.</p>	
<p><u>MAAP Ops Subcommittee #2</u>  Llyod Linke MAPP  Allan Silk Manitoba Hydro  Paul Brune NPPD  Tod Gosnell Omaha Public Pwr Dist  Paul Koskela Minnesota Pwr  Larry Larson Otter Tail Power  Derrick Moe WAPA  Dick Pursley Great River Energy  Martin Trencle Xcel Energy  Joseph Knight MAPPCOR</p>	<p>The Sanctions Subsection (number 6) for each heading should define the MW value to be used when determining monetary penalties if an entity is found to be non-compliant, or clarify that the fixed level sanctions should be used and not the per-MW sanctions.</p> <p>Is there a reason why NERC defined terms are not capitalized throughout the standard?</p>

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The links to the sanctions table have been added. All infractions use the letters and flat dollar fines except for a level four non-compliance for requirement 204 – exceeding an IROL for time greater than  $T_v$ . For this particular violation, the following language was added: Level four non-compliance sanctions shall be the greater of the fixed dollar sanctions listed in the matrix, or the number of Megawatts above the IROL multiplied by the dollar value for the number of times non-compliant.

NERC's Vice President and Legal Counsel is responsible for making the final decision on the format of these new standards, and initially he did not support the practice of capitalizing defined terms. Over the past several months there have been so many comments submitted on SARs and draft Standards requesting that defined terms be capitalized, that this practice of capitalizing defined terms is being supported. In the revised standard, defined terms have been capitalized.

BPA Adm TBL #1

James Murphy      Mike Viles  
 James Randall      Al Johnson  
 Jeff Newby          Jim Gronquist  
 Sylvia Wiggerhaus   Brian Tuck  
 Dick Spence        Tracy Rolstad  
 Steve Hitchens

In the Northwest, where there isn't a RTO in place, there seems to be some confusion on what current entity would be the RA? Who makes the decision or assigns who is the RA? We have also heard that a RA can direct TOP or others to do operational planning analysis, but we have not been able to find it in the Functional Model or this document. If that is the intent then it should be included in the Functional Model or this document. If you could direct us in these matters it would greatly improve our understanding of the document. Thank you for your help.

Each entity must decide what function(s) it wants to perform. That entity will need to 'register' with NERC and then for entities that want to perform the RA, BA, IA or TOP functions, the entity must obtain certification to perform that function. If this standard is approved and is implemented prior to RA Certification, each control area would be responsible for compliance with this standard.

When the Functional Model was presented to the industry, presenters verbally indicated that an entity may delegate some of its responsibilities. This does not appear in the text of the Functional Model, and is not included in the SARs for certification, and is not included in the text of this standard. In the explanatory information drafted to accompany the latest draft of proposed changes to the Functional Model, this issue is addressed. You are encouraged to bring your concerns to the attention of the Functional Model Review Task Group.

Ed Davis    Entergy Services    #1

1. Two definitions should be changed based on our comments:
  - Reliability Authority Area: A defined electrical system bounded by interconnection (tie -line) metering and telemetry monitored by a single reliability authority.
  - $T_v$ : The violation time associated with a limit that is determined by the Transmission Owner for equipment-based limits and by the Reliability Authority and the Planning Authority for system-based limits.
2. We are becoming increasingly concerned about this standard development process. This and other standards are being developed based on certain definitions and assumptions contained in the Function Model. These "standards" will become fixed such that the industry will be held accountable to and measured by these standards. However, the Functional Model and the definitions contained in that

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	<p>revised model are changing and will not necessarily be the same as those used to develop the standards, like this Operate Within Limits. What is the process for reviewing, revising and implementing changes to the Functional Model, and the impact of those changes on all these standards that have been developed based on the old Functional Model? Are the changes to the Functional Model being vetted by all industry participants before implementation? What is the process to revise these standards prior to implementing changes to the Functional Model?</p>
<p><b>The Reliability Authority Area definition was modified to reflect the intent of your suggestion, but the word, “direct” was used rather than monitor.</b></p> <p>The change to Tv was not made, because this does not conform with the delination between facility limits and system operating limits established in the Determine Facility Ratings, System Operating Limits and Transfer Capabilities standard (DFR Standard). In the DFR standard, the facility owners establish facility ratings, and provide these ratings to the RA, TOP and PA. The RA, TOP and PA have responsibility for establishing System Operating Limits that respect the Facility Ratings already established. While a facility rating may have a time component associated with it, this is not the same time component used by the RA when a system operating limit is labeled an IROL. The T<sub>v</sub> associated with the IROL must respect the time component established by the facility owner, but the Tv may be shorter than the time component associated with the facility rating.</p> <p><b>Your comments about the Functional Model address concerns that are outside the scope of the SDT. You are encouraged to bring your concerns to the attention of the Functional Model Review Task Group.</b></p>	
<p>Stuart Goza TVA #1  <u>SERC Operations Planning Subcommittee</u>  Carter Edge SEPA #4, 5  William Gaither So Carolina Pub Serv Auth #1  Mike Miller Southern Co #1  Roger Brand Muni Elec Auth GA #1  Phil Creech Progress Energy – CP&amp;L #1  Gene Delk So Carolina Elec &amp; Gas #1  Al McMeekin So Carolina Elec &amp; Gas #1  Greg Ott Alcoa-Yadkin #1  Doug Newbaue GA System Operations #1  Mike Clements TVA #1  Don Reichenbach Duke Energy #1  Lynna Estep SERC #2  Mark Creech TVA #1</p>	<p>Please note that throughout the standard the Tv term is used but is not formatted the same (Tv vs. T<sub>v</sub>). This is a minor, formatting issue, but should be consistent throughout to reduce confusion.</p>
<p><b>Agreed. We will try to do a better job of proofing future drafts before posting.</b></p>	
<p><u>Trans Subcommittee</u></p>	<p>The TS recommends identifying the terms used in the standards that are found in the</p>

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<p>Robert E. Reed PJM          Daniel Cooper Michigan Public Power Agency          Ken Donohoo ERCOT          Michael Gildea Duke-Energy, North America          Francis Halpin Bonneville Power Administration          Tom Mallinger Midwest ISO          Darrick Moe Western Area Power Adm          Scott Moore American Electric Power          Bill Slater Florida Power Corporation          Tom Stuchlik Western Resources          Joseph Styslinger Southern Company          David Thorne D. H. Thorne Consultants, Inc          Robert Waldele New York ISO          Roman Carter Southern Company          John Ahr Alleghany Power Systems          Susan Morris SERC          Ed Pfeiffer Ameren          Ray Palmieri ECAR          Tom Vandervort NERC</p>	<p>new Standards Process “Glossary of Terms” repository. The TS suggests small capital letters, highlighted letters, bold letters, italicized letters or other method of making the defined words, terms and acronyms stand out.</p>
<p>NERC’s Vice President and Legal Counsel is responsible for making the final decision on the format of these new standards, and initially he did not support the practice of capitalizing defined terms. Over the past several months there have been so many comments submitted on SARs and draft Standards requesting that defined terms be capitalized, that this practice of capitalizing defined terms is being supported. In the revised standard, defined terms have been capitalized.</p>	