

**Individual or group. (28 Responses)**

**Name (18 Responses)**

**Organization (18 Responses)**

**Group Name (10 Responses)**

**Lead Contact (10 Responses)**

**IF YOU WISH TO EXPRESS SUPPORT FOR ANOTHER ENTITY'S COMMENTS WITHOUT ENTERING ANY ADDITIONAL COMMENTS, YOU MAY DO SO HERE. (0 Responses)**

**Comments (28 Responses)**

**Question 1 (22 Responses)**

**Question 1 Comments (28 Responses)**

**Question 2 (26 Responses)**

**Question 2 Comments (28 Responses)**

**Question 3 (19 Responses)**

**Question 3 Comments (28 Responses)**

**Question 4 (22 Responses)**

**Question 4 Comments (28 Responses)**

**Question 5 (18 Responses)**

**Question 5 Comments (28 Responses)**

**Question 6 (20 Responses)**

**Question 6 Comments (28 Responses)**

**Question 7 (20 Responses)**

**Question 7 Comments (28 Responses)**

**Question 8 (25 Responses)**

**Question 8 Comments (28 Responses)**

**Question 9 (0 Responses)**

**Question 9 Comments (28 Responses)**

Group
Northeast Power Coordinating Council
Guy Zito
Yes
No
As per the expert review, delete IRO-004 R1 (duplicative) and IRO-014 R2, R4 (administrative), R7 and R8 (duplicative). The Background Information (above on the Comment Form) reads "Retire Requirement R1 under Criterion B7 of Paragraph 81; as well as Requirements R2 and R3 upon regulatory approval of IRO-001-3." IRO-004-2 only has one requirement. There is no justification for adding the TSP to R2 and R3 of IRO-001-4. If the intent is to curtail transmission service or transactions using such service, this can currently be accomplished by one of the operating entities (BA, TOP or RC) using existing procedures such as TLR and

redispatch. The Purpose statements of each Standard should be reviewed to ensure that the combined Standard adequately addresses both.

Yes

Yes

Suggest referencing the specific NAESB business practice associated with the retirement of Requirement R1 for completeness.

Yes

Yes

Yes

After review of the 16 Standards related to Interconnection Reliability Operations and Coordination, suggest that the TOP Standards be reviewed to see if similar aggregation is possible.

Individual

Nazra Gladu

Manitoba Hydro

Yes

Yes

Yes

Yes

Yes

Yes

Yes

Yes

Individual
Michelle R. D'Antuono
Ingleside Cogeneration, LP
Yes
Ingleside Cogeneration supports the recommended changes to IRO-003-2, even it appears to only apply to Reliability Coordinators. If the FERC directive is implemented as written, the RC will be driven to call for downstream Facility owners/operators to supply "critical" facility status indicators that may or may not serve any useful reliability purpose. We agree that the review team has chosen an equally effective method to address the ruling – reinforcing the RC's primary function to look for SOL and IROL violations. Additional requirements are not necessary as the RC will have every motivation to acquire the telemetry they need to monitor those parameters.
Individual
Michael Falvo
Independent Electricity System Operator
Yes
Yes
Yes
We agree with reviewing and revising R1 as appropriate, but suggest that the consideration to have R1 covered by the Operating Processes, Plans or Procedures required under IRO-009-1, Requirement R1 be reviewed carefully since the latter requirement deals with IROL only whereas the R1 in IRO-005-4 addresses Adverse Reliability Impacts which cover other system issues such as low voltages, insufficient resource, SOLs, etc.
Yes
No
We do not agree with retiring R1 since it was added to the standard and worded that way to

address a FERC directive which asked NERC to clearly include a requirement in the standard that TLR is not an effective means for mitigating IROL violation. The language “...prior to or concurrently with the initiation of the Eastern Interconnection TLR procedure (or continuing management of this procedure if already initiated)” is meant to convey the idea that TLR alone cannot and shall not be used to mitigate IROL violation, but it can be used together with but not prior to other (more effective) means. The proposal to retire R3 also needs to be reconsidered. The need for this requirement in view of IDC’s automatic generation of the actions contained in R3 was debated at length when the standard was posted for commenting and balloting in 2009. In the end, the vast majority the industry supported the notion that such actions would be required if the event that the IDC became unavailable. Also, there was the issue with who would hold the responsibility for communicating these actions given that it was not appropriate for the vendor of IDC to take up this responsibility and ensure the correctness of the communicated actions. We suggest the 5-Year Review Team of the SDT to consult with NERC staff (the IRO-006-5 Standard Developer) and/or the TLR SDT for further details. Regarding the proposals for R4, the three bullets under R4 need to be retained if Part 3.1 is retired. Otherwise, there is room for improvement to reword and consolidate the three bullets.

Yes

We agree with all the proposed change except the capitalization of “interconnection” in the purpose statement. According to NERC Glossary, “When capitalized, any one of the three major electric system networks in North America: Eastern, Western, and ERCOT.” We interpret the word “interconnection” in the purpose to mean interconnected network in general without specific reference to any particular Interconnection. If it was the latter, then all of the Interconnection will need to be spelled out, or that the purpose statement should be reworded to say “all Interconnections”. We suggest to leave this word in local case.

Yes

We agree with all the proposed retirement/revisions but the proposal to remove “without delay” from R4 needs to be revisited. There was a lengthy debate on this during the posting and balloting of the standard. The decision to leave this in the requirement was based primarily on concerns expressed by the regulatory authorities that without such words, Responsible Entities would delay taking actions until closer to the end of the Tv period. This would not drive the right behavior to mitigate IROL exceedances as soon as practicable. Please consult the staff facilitator (Standard Developer) for the project and/or the Reliability Coordination SDT. Although we not have a position on the proposed revision to the VSL for R4, we suggest that the staff facilitator (Standard Developer) for the project and/or the Reliability Coordination SDT be consulted to get the background behind the 5 minute threshold as it was added to address regulatory authorities’ concern over the delayed actions issue.

Yes

We agree with all of the proposed changes/retirements except the followings: Replacing “interconnection” with “Interconnection”. Please refer to our comment under Q6 on a similar proposal for IRO-008-1.

Individual
Andrew Gallo
City of Austin dba Austin Energy
Intentionally left blank – not applicable to AE
Yes
Intentionally left blank – not applicable to AE
Intentionally left blank – not applicable to AE
Intentionally left blank – not applicable to AE
Intentionally left blank – not applicable to AE
Intentionally left blank – not applicable to AE
Yes
Austin Energy (AE) requests the Five-Year Review team add the consideration of further consolidation to the list. It seems there are a lot of IRO standards with one or two requirements each.
Individual
Tammy Porter
Oncor Electric Delivery
Yes
Yes
Yes
Group
PacifiCorp
Ryan Millard



Individual
Dave Willis
Idaho Power Company
Yes
Yes
Yes
Individual
Thomas Foltz
American Electric Power
Yes
Yes
Yes
Individual
Karen Webb
City of Tallahassee - Electric Utility

No
While TAL agrees with the deletion of the first part of the requirement, we are concerned with the second as proposed. With the recent guidance in FERC Order 773 that Cranking Paths do not have to be BES elements, TAL is concerned with how deep the monitoring will go. Will this language require entities to place remote monitoring on these assets to allow the current status to be transmitted to the RC? These assets (480 VAC) currently do not have any remote access or monitoring capability, keeping them out of the CIP Critical Cyber Asset category. To add this capability for a resource that cannot power anything but the auxiliaries at its own station is burdensome. These assets cannot help restore the RC Area, they can only start the local TOP/BA area. The area referred to should be described as the RC Area if that is what is intended.
Yes
No
The action proposed is to recommend finding a way to do it. The review team should propose the changes needed or recommended.
Yes
Yes
No
IRO-008-1, R3 is the same as IRO-005-4, R1 as proposed above and should be retired.
No
While the proposed actions are okay, the recommendations in EOP-005-4, R1 and IRO-008-1, R3 should be combined to remove the duplicative requirement of IRO-009-1. All 3 deal with mitigating IROs within Tv. Consolidating will make it easier to demonstrate compliance and remove the multiple infractions for a single non-compliance event.
Yes
Group
ACES Standards Collaborators
Ben Engelby
Yes
The proposed revisions to clarify the reliability objective of the requirement are reasonable.
No
(1) We have concerns that the FYRT is recommending to modify IRO-001-3 before the



Commission has issued a final order. These recommendations are premature and should be delayed until FERC has approved IRO-001-3. (2) We agree with the recommendations to retire the requirements that meet Paragraph 81 criteria. (3) We are concerned with the addition of TSP to IRO-001-3 R2 and R3. From a practical perspective, what directive would a TSP ever receive that is not handled in other standards. For example, a TSP might receive a request from TOP to lower an SOL to restrict the selling of transmission service on a constrained facility; however, FAC-014-2 R5.2 already compels the TOP to communicate that SOL and MOD-028 compels the TSP to use the SOL.

Yes

The proposed revisions to ensure consistency of the requirements with other standards are reasonable.

Yes

The proposal to affirm IRO-006 is reasonable.

Yes

We agree with the recommendations to retire the requirements that meet Paragraph 81 criteria and to clarify language where needed.

Yes

We agree with the recommendations to retire the requirements that meet Paragraph 81 criteria and to clarify language where needed.

Yes

We agree with the recommendations to combine requirements R1 and R2 and to remove ambiguous language where needed.

No

(1) We disagree that the DP should be included as an applicable entity to IRO-010. The statement in the recommendation, "The DP owns and installs UF relays and other assets" is vague and misleading. The DP may own underfrequency relays, but in most instances these relays are installed on sub-transmission or distribution systems that are not part of the BES. This equipment is not subject to the NERC standards and therefore should not be included in IRO-010. In question 5 of the review form, the team even acknowledged that not all entities have Facilities. Further, the DP is already required to supply the data to the PC via PRC-006. The DP should not be included here. (2) We disagree with the inclusion of the PC. While it is correct that the PC builds the necessary models there is no documented case where an RC has been unable to obtain the necessary models from the PC. We think this is an unnecessary addition to the standard. (3) We agree with including the interpretation for R1 and R3 for clarity. (4) We agree with other clarifications for glossary terms and compliance elements, with the exception of including the DP, as mentioned earlier. (5) The Independent Expert Report recommended consolidating IRO-010 with TOP-003-2. In the review form, the team mentions revising the standard to align language with TOP-003. We recommend considering a consolidation of the two standards.

(1) We recommend that the review team take the Independent Expert Review into consideration. There are several EOP modifications based on the expert's recommendations.

We are concerned that the review teams are not aware of or did not consider these expert recommendations. (2) Thank you for the opportunity to comment.
Group
Southern Company
Wayne Johnson
Yes
Southern agrees with the SERC OC Comments and also strongly supports the recommended changes to R2. The phrase "observe and assess" is much more clear than "shall know the status of".
Yes
Southern agrees with the SERC OC Comments.
Yes
Yes
Yes
The 5 Year Review Team noted that IRO-006-EAST Requirement 1 is redundant with both IRO-008-1 Requirement 3 and IRO-009-1 Requirement 4. Southern agrees with this assessment. Given R1 is redundant with two other requirements; this implies that IRO-008-1 Requirement 3 and IRO-009-1 Requirement 4 are redundant with each other. As such, of these three requirements, only one should be maintained as an enforceable requirement.
Yes
Yes
Southern agrees with the SERC OC Comments.
Yes
No other comments.
Group
SERC OC Review Group
Jim Case
Yes
R2: The FYRT should consider moving the concept addressed by the second sentence to EOP-006. The FYRT is requested to coordinate with the EOP FYRT to look at this point. R2. Each Reliability Coordinator shall know the current status of all critical facilities whose failure, degradation or disconnection could result in an SOL or IROL violation. Reliability Coordinators shall also know the status of any facilities that may be required to assist area restoration

objectives. Proposed R2 (FYRT): Each Reliability Coordinator shall observe and assess the status of Facilities that may be required to assist area restoration objectives.
Yes
Concur with retiring this Standard. We further request that the FYRT recommend use of language similar to that of TOP-001-2 R1 and R2.
Yes
Yes
Yes
Yes
Yes
The FYRT should consider removing “without delay” from M3. The FYRT should consider changing “conservative” to “limiting” in M3.
Yes
The comments expressed herein represent a consensus of the views of the above named members of the SERC OC Review Group only and should not be construed as the position of the SERC Reliability Corporation, or its board or its officers.
Group
Dominion
Mike Garton
Yes
No
Dominion does not believe the SDT has justified adding TSP to R2 and R3. If the intent is curtail transmission service or transactions using such service, we would suggest that this can be currently be accomplished by one of the operating entities (BA, TOP or RC) using existing procedures such as TLR and redispatch. Dominion suggests review of the Purpose of each standard to ensure the combined standard adequately addresses both.
Yes
Yes
Dominion suggests referencing the specific NAESB business practice associated with the retirement of Requirement R1 for completeness.

Yes
Yes
Yes
Not sure why UFLS/UVLS data is needed to support real-time operation.
Dominion believes that there is no need to have 16 standards related to Interconnection Reliability Operations and Coordination and suggests that the team look at the TOP standards currently filed at FERC to see if similar aggregation is possible.
Individual
Kathleen Goodman
ISO New England Inc.
Yes
No
As per the expert review, delete IRO-004 R1 (duplicative). The Background Information (above on the Comment Form) reads “Retire Requirement R1 under Criterion B7 of Paragraph 81; as well as Requirements R2 and R3 upon regulatory approval of IRO-001-3.” IRO-004-2 only has one requirement. There is no justification for adding the TSP to R2 and R3 of IRO-001-4. If the intent is to curtail transmission service or transactions using such service, this can currently be accomplished by one of the operating entities (BA, TOP or RC) using existing procedures such as TLR and redispatch. The Purpose statements of each Standard should be reviewed to ensure that the combined Standard adequately addresses both.
Delete IRO-005 R4 (“The Reliability Coordinator shall disseminate information within its Reliability Coordinator Area, as required.”) and R11 (The Transmission Service Provider shall respect SOLs and IROLs in accordance with filed tariffs and regional Total Transfer Calculation and Available Transfer Calculation processes.”). R4 doesn’t say anything – what information, to whom, as required by??? R11 doesn’t make sense as TSPs don’t operate any equipment.
Yes
Yes
Yes
Yes
No
Adding the DP does not make sense since every RC does not interface with its DPs unless the

DPs are also TOPs.
Individual
Bill Fowler
City of Tallahassee
No
While TAL agrees with the deletion of the first part of the requirement, we are concerned with the second as proposed. With the recent guidance in FERC Order 773 that Cranking Paths do not have to be BES elements, TAL is concerned with how deep the monitoring will go. Will this language require entities to place remote monitoring on these assets to allow the current status to be transmitted to the RC? These assets (480 VAC) currently do not have any remote access or monitoring capability, keeping them out of the CIP Critical Cyber Asset category. To add this capability for a resource that cannot power anything but the auxiliaries at its own station is burdensome. These assets cannot help restore the RC Area, they can only start the local TOP/BA area. The area referred to should be described as the RC Area if that is what is intended.
Yes
No
The action proposed is to recommend finding a way to do it. The review team should propose the changes needed or recommended. PROPOSED: R1. When the results of an Operational Planning Analysis or Real-time Assessment indicate an anticipated or actual condition with Adverse Reliability Impacts within its Reliability Coordinator Area, each Reliability Coordinator shall notify all impacted Transmission Operators and Balancing Authorities in its Reliability Coordinator Area. R1.1. If any IROL is identified as being exceeded during anticipated normal and Contingency event conditions, the RC shall have one or more Operating Processes, Procedures, or Plans that identify actions it shall take, or actions it shall direct others to take, (up to and including load shedding) that can be implemented in time to prevent exceeding those IROLs or mitigating the IROL within Tv.
Yes
Yes
No
IRO-008-1, R3 is the same as IRO-005-4, R1 as proposed above and should be retired.
No
While the proposed actions are okay, the recommendations in EOP-005-4, R1 and IRO-008-1, R3 should be combined to remove the duplicative requirement of IRO-009-1. All 3 deal with mitigating IROLs within Tv. Consolidating will make it easier to demonstrate compliance and

remove the multiple infractions for a single non-compliance event.
Yes
Individual
Scott Langston
City of Tallahassee
No
While TAL agrees with the deletion of the first part of the requirement, we are concerned with the second as proposed. With the recent guidance in FERC Order 773 that Cranking Paths do not have to be BES elements, TAL is concerned with how deep the monitoring will go. Will this language require entities to place remote monitoring on these assets to allow the current status to be transmitted to the RC? These assets (480 VAC) currently do not have any remote access or monitoring capability, keeping them out of the CIP Critical Cyber Asset category. To add this capability for a resource that cannot power anything but the auxiliaries at its own station is burdensome. These assets cannot help restore the RC Area, they can only start the local TOP/BA area. The area referred to should be described as the RC Area if that is what is intended.
Yes
No
The action proposed is to recommend finding a way to do it. The review team should propose the changes needed or recommended. PROPOSED: R1. When the results of an Operational Planning Analysis or Real-time Assessment indicate an anticipated or actual condition with Adverse Reliability Impacts within its Reliability Coordinator Area, each Reliability Coordinator shall notify all impacted Transmission Operators and Balancing Authorities in its Reliability Coordinator Area. R1.1. If any IROL is identified as being exceeded during anticipated normal and Contingency event conditions, the RC shall have one or more Operating Processes, Procedures, or Plans that identify actions it shall take, or actions it shall direct others to take, (up to and including load shedding) that can be implemented in time to prevent exceeding those IROLs or mitigating the IROL within Tv.
Yes
Yes
No
IRO-008-1, R3 is the same as IRO-005-4, R1 as proposed above and should be retired.
No
While the proposed actions are okay, the recommendations in EOP-005-4, R1 and IRO-008-1,

R3 should be combined to remove the duplicative requirement of IRO-009-1. All 3 deal with mitigating IROs within Tv. Consolidating will make it easier to demonstrate compliance and remove the multiple infractions for a single non-compliance event.
Yes
Group
SPP Standards Review Group
Robert Rhodes
No
To eliminate any conflict regarding division of responsibility between the RC in IRO-003-2 and the TOP in FAC-014-2, we suggest the proposed language in R1 be modified to reflect the backup role of the RC in determining SOL exceedances which are primarily a function of the TOP.
Yes
Yes
Yes
No
We suggest that the Review Team take a look at incorporating a reference in the standard to the criteria, which are found in the NAESB Business Practices, used in determining the specific curtailments to be made when a TLR is issued.
Yes
Yes
No
When including the Planning Coordinator in the Applicability Section of IRO-010-1a, the Review Team needs to look at the requirements to make sure the Time Horizons are consistent with the Planning Coordinator functionality. The Time Horizon for R3 is Operational Planning. Is this compatible with the Planning Coordinator function?
Individual
Jennifer Weber
TVA
Endorse the comments of the SERC OC Review Group, in addition to making the comments

included here.
Yes
R1: Suggest that the word “determine” be replaced with the word “detect”. R2: Consider moving the concept addressed by the second sentence to EOP-006.
Yes
Concur with retiring this Standard See also comment in “Other Comments” section for IRO-001-3, which the FYRT addresses in their comments on this Standard: suggest the FYRT recommend use of language similar to that of TOP-001-2 R1 and R2.
No
IRO-005-4 should be retired in its entirety. The proposed revision to the Glossary definition of the term “Adverse Reliability Impact” is encompassed in its entirety by the FERC-approved Glossary definition of “IROL”. As such, the requirements in IRO-005-4 are redundant with IRO-008-1. Along with this recommendation, the term “Adverse Reliability Impact” should be evaluated for retirement, replacing it with “IROL” or other phrases where appropriate throughout all NERC Standards. If this does not seem appropriate, then the term “Adverse Reliability Impact” should be revised to clearly distinguish how it differs from the concept of an IROL, when used in NERC Standards.
Yes
Yes
No
Recommend retaining R3, and instead retiring IRO-005-4 in its entirety.
Yes
R4: suggest “...the RC shall act, or direct others to act, to mitigate the IROL exceedance within its Tv.” R5 needs to be moved to IRO-014-2, as the concept is related to R5 through R8 of that Standard. M3: eliminate “without delay”
Yes
IRO-001-3 R1 “RC authority to act” is redundant with IRO-014-2 R1.6 The language in IRO-001-3 R2 and R3 need to be revised to match that of TOP-001-2. The requirement to “comply with its Reliability Coordinator’s direction” establishes a level of RC authority that is too broad, vague, and non-specific. (The FYRT touches on this issue in the “2. Clarity” discussion for IRO-004-2.) A requirement should be added to IRO-002-3 to address the detection and correction of analysis tool degradation and/or malfunction. IRO-014-2: Replace the term “Adverse Reliability Impact” with “IROL” R1.6 is redundant with IRO-001-3 R1 R5: Notifications should only be required to potentially affected RCs rather than to all RCs. Move IRO-009-1 R5 to this Standard
Individual
Bob Thomas





Yes
While Duke Energy agrees with the recommendations of the IRO Five Year Review Team, we would like some assurance be made that outage plans are assessed sufficiently ahead of time for their reliability impact and when plans are modified. The concern is that it is no longer clear that the IRO, FAC, or TOP standards address this issue to ensure proper assessments are being performed.
Individual
Ramon Barany for David Austin
NIPSCO
Yes
Yes
Per David Austin for R3: The term "reliability relationship" is ambiguous and needs to be vetted or framed in the context of one of the terms in the NERC glossary. For example, NIPSCO is in a clear "reliability relationship" with MISO as we have a contractual agreement with them. However, I am also in a "reliability relationship" with PJM, as we are neighboring TOPs. Maybe we could use the term "contractual Agreement" as Agreement is a NERC defined term.
Group
US Bureau of Reclamation
Erika Doot
Yes
Yes
Yes
Yes

Yes
Yes
Yes
Reclamation thanks the review team for their hard work on this project.
Individual
Andrew Z. Puztai
American Transmission Company, LLC
Yes
Individual
Cheryl Moseley
Electric Reliability Council of texas, Inc.
Yes
Yes
Yes
We agree with reviewing and revising R1 as appropriate, but suggest that the consideration to have R1 covered by the Operating Processes, Plans or Procedures required under IRO-009-1, Requirement R1 be reviewed carefully since the latter requirement deals with IROL only whereas the R1 in IRO-005-4 addresses Adverse Reliability Impacts which cover other system issues such as low voltages, insufficient resource, SOLs, etc.
Yes

No
ERCOT believes that the word “interconnection” should remain lower case in the Purpose Statement and in Requirement R2.
Yes
In Requirement R4, we agree that the phrase “without delay” needs to be removed because it is ambiguous and that Tv is the measurable indicator.
No
ERCOT believes that the word “interconnection” should remain lower case in the Purpose Statement.
Group
ISO/RTO Council Standards Review Committee
Greg Campoli
Yes
No
As per the expert review, delete IRO-004 R1 (duplicative) and IRO-014 R2, R4 (administrative), R7 and R8 (duplicative). The Background Information (above on the Comment Form) reads “Retire Requirement R1 under Criterion B7 of Paragraph 81; as well as Requirements R2 and R3 upon regulatory approval of IRO-001-3.” IRO-004-2 only has one requirement. There is no justification for adding the TSP to R2 and R3 of IRO-001-4. If the intent is to curtail transmission service or transactions using such service, this can currently be accomplished by one of the operating entities (BA, TOP or RC) using existing procedures such as TLR and redispatch. The Purpose statements of each Standard should be reviewed to ensure that the combined Standard adequately.
Yes
Yes
No
We do not agree with retiring R1 since it was added to the standard and worded that way to address a FERC directive which asked NERC to clearly include a requirement in the standard that TLR is not an effective means for mitigating IROL violation. The language “...prior to or concurrently with the initiation of the Eastern Interconnection TLR procedure (or continuing management of this procedure if already initiated)” is meant to convey the idea that TLR alone cannot and shall not be used to mitigate IROL violation, but it can be used together with

but not prior to other (more effective) means. The proposal to retire R3 also needs to be reconsidered. The need for this requirement in view of IDC's automatic generation of the actions contained in R3 was debated at length when the standard was posted for commenting and balloting in 2009. In the end, the vast majority the industry supported the notion that such actions would be required if the event that the IDC became unavailable. Also, there was the issue with who would hold the responsibility for communicating these actions given that it was not appropriate for the vendor of IDC to take up this responsibility and ensure the correctness of the communicated actions. We suggest the 5-Year Review Team of the SDT to consult with NERC staff (the IRO-006-5 Standard Developer) and/or the TLR SDT for further details. Regarding the proposals for R4, the three bullets under R4 need to be retained if Part 3.1 is retired. Otherwise, there is room for improvement to reword and consolidate the three bullets. Note that PJM does not support this comment.

Yes

Yes

Yes

Note: PJM does not support this comment.

Individual

Alice Ireland

Xcel Energy

Yes

Yes

Yes

Yes

Yes

Yes

Yes

No

Since the rationale for the change is to ensure that RC can receive UFLS and UVLS data from

applicable data owners, it should be noted that the PC is also a recipient (like the RC) of UFLS/UVLS data from the TO's and DP's. Therefore, adding PC as applicable entity would be inconsistent (and potentially contradictory) with the UFLS/UVLS data ownership and provider roles of TO and DP identified in the applicable standards – see PRC-007-0 (existing) and PRC-006-1 (future) for UFLS and PRC-021-1 (existing) for UVLS.