NERC
NORTH AMERICAN ELECTRIC RELIABILITY CORPORATION

Comment Form for Draft Joint NERC/NAESB System Operator's TLR Reference Manual

Please use this form to submit comments on the first draft of the Joint NERC/NAESB System Operator's TLR Reference Manual. Comments must be submitted by **March 24, 2008**. You must submit the completed form by emailing it to sarcomm@nerc.net with the words "TRL Manual" in the subject line. If you have questions please contact Andy Rodriquez at andy.rodriquez@nerc.net or 609-452-8060.

Individual Commenter Information **(Complete this page for comments from one organization or individual.)**		
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Organization:	American Electric Power	
Telephone:	614-716-2053	
E-mail:	tkness@aep.com	
NERC Region (check all Regions in which your company operates)		**Registered Ballot Body Segment (check all industry segments in which your company is registered)**
☒ **ERCOT**	☒	1 — Transmission Owners
☐ **FRCC**	☐	2 — RTOs and ISOs
☐ **MRO**	☒	3 — Load-serving Entities
☐ **NPCC**	☐	4 — Transmission-dependent Utilities
☒ **RFC**	☒	5 — Electric Generators
☐ **SERC**	☒	6 — Electricity Brokers, Aggregators, and Marketers
☒ **SPP**	☐	7 — Large Electricity End Users
☐ **WECC**	☐	8 — Small Electricity End Users
☐ **NA – Not Applicable**	☐	9 — Federal, State, Provincial Regulatory or other Government Entities
	☐	10 — Regional Reliability Organizations and Regional Entities

Group Comments (Complete this page if comments are from a group.)

Group Name:

Lead Contact:

Contact Organization:

Contact Segment:

Contact Telephone:

Contact E-mail:

Additional Member Name	Additional Member Organization	Region*	Segment*

*If more than one Region or Segment applies, please list all that apply. Regional acronyms and segment numbers are shown on prior page.

Background Information

As part of the development of IRO-006-4, NERC and NAESB together developed the *Joint NERC/NAESB System Operator's TLR Reference Manual.* This manual is intended to aid system operators in implementing the NERC and NAESB standards related to the TLR process by consolidating both NERC and NAESB requirements within a single document.

While not a standard, NERC and NAESB are soliciting comments on the manual in an effort to ensure it meets industry needs and is as complete and accurate as possible. We thank you in advance for your assistance.

Based on industry comments, we will revise and submit this manual to the Standards Committee for approval to post the manual as a reliability standard "Supporting Document," with a link to IRO-006.

TLR Reference Manual Comment Form Questions

1. We have prepared this reference manual in response to stakeholder comments related to the NERC/NAESB split of IRO-006. Does the posted document meet your expectations? If not, please provide an explanation.

   ☒ Yes

   ☐ No

   Comments:

2. The reference manual has been structured to show both the NERC and NAESB standards together, including reference numbers to the NERC and NAESB standards. Do you have any suggestions regarding numbering and referencing that would be more effective?

   Comments: No.

3. The SDT expended a significant amount of effort to create this reference manual. Do you find this reference manual provides sufficient additional value to the established NERC and NAESB standards to justify the effort to continue maintaining this manual? If yes, who should become responsible for maintaining the Reference Manual after the SDT is disbanded?

   ☒ Yes

   ☐ No

   Comments: The formal Reliability Standard Development Process could also be used to maintain this manual in the future.

4. Are you aware of any conflicts between the reference manual and any regulatory function, rule/order, tariff, rate schedule, legislative requirement or agreement? If yes, please explain your answer.

   ☐ Yes

   ☒ No

   Comments:

5. Please provide any other comments you have (that you have not already provided in response to the above questions) regarding this draft reference manual.

   Comments: Need to define "ERO" in the manual. Also, on page 9, Measure 3, it talks about using a local procedure as a substitute for curtailment as directed by the Interconnection-wide procedure. But the local procedure has to be prior approved by the ERO. Does this mean we can not develop local procedures on the fly because it has not been approved by the ERO?

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Individual Commenter Information **(Complete this page for comments from one organization or individual.)**		
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NERC Region (check all Regions in which your company operates)		**Registered Ballot Body Segment (check all industry segments in which your company is registered)**
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   ☒ Yes

   ☐ No

   Comments: This refernece manual is not as helpful as it would be if BPA was a part of the Eastern Interconnection or ERCOT.

2. The reference manual has been structured to show both the NERC and NAESB standards together, including reference numbers to the NERC and NAESB standards. Do you have any suggestions regarding numbering and referencing that would be more effective?

   Comments: None

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   ☐ Yes

   ☒ No

   Comments: As a part of the WECC, I believe it would be better served if this material was covered in a document a little more specific to the region it pertains to.

4. Are you aware of any conflicts between the reference manual and any regulatory function, rule/order, tariff, rate schedule, legislative requirement or agreement? If yes, please explain your answer.

   ☐ Yes

   ☒ No

   Comments:

5. Please provide any other comments you have (that you have not already provided in response to the above questions) regarding this draft reference manual.

   Comments: This is a large document that isn't easy to navigate. The table of contents doesn't provide much assistance. This document refers to the "WSCC Unscheduled Flow Mitigation Plan" I thought we were the WECC.

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Individual Commenter Information **(Complete this page for comments from one organization or individual.)**		
Name:	Greg Rowland	
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E-mail:	gdrowland@dukeenergy.com	
NERC Region (check all Regions in which your company operates)		**Registered Ballot Body Segment (check all industry segments in which your company is registered)**
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   ☒ Yes

   ☐ No

   Comments:

2. The reference manual has been structured to show both the NERC and NAESB standards together, including reference numbers to the NERC and NAESB standards. Do you have any suggestions regarding numbering and referencing that would be more effective?

   Comments: no suggestions

3. The SDT expended a significant amount of effort to create this reference manual. Do you find this reference manual provides sufficient additional value to the established NERC and NAESB standards to justify the effort to continue maintaining this manual? If yes, who should become responsible for maintaining the Reference Manual after the SDT is disbanded?

   ☒ Yes

   ☐ No

   Comments: NERC should maintain the manual

4. Are you aware of any conflicts between the reference manual and any regulatory function, rule/order, tariff, rate schedule, legislative requirement or agreement? If yes, please explain your answer.

   ☐ Yes

   ☒ No

   Comments:

5. Please provide any other comments you have (that you have not already provided in response to the above questions) regarding this draft reference manual.

   Comments: no other comments

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Individual Commenter Information **(Complete this page for comments from one organization or individual.)**		
Name:	Steve Myers	
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NERC Region (check all Regions in which your company operates)		**Registered Ballot Body Segment (check all industry segments in which your company is registered)**
☒ **ERCOT** ☐ **FRCC** ☐ **MRO** ☐ **NPCC** ☐ **RFC** ☐ **SERC** ☐ **SPP** ☐ **WECC** ☐ **NA – Not Applicable**	☐	1 — Transmission Owners
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Based on industry comments, we will revise and submit this manual to the Standards Committee for approval to post the manual as a reliability standard "Supporting Document," with a link to IRO-006.

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1. We have prepared this reference manual in response to stakeholder comments related to the NERC/NAESB split of IRO-006. Does the posted document meet your expectations? If not, please provide an explanation.

   ☐ Yes

   ☒ No

   Comments: The document should clarify that TLR is not used in ERCOT.

2. The reference manual has been structured to show both the NERC and NAESB standards together, including reference numbers to the NERC and NAESB standards. Do you have any suggestions regarding numbering and referencing that would be more effective?

   Comments:

3. The SDT expended a significant amount of effort to create this reference manual. Do you find this reference manual provides sufficient additional value to the established NERC and NAESB standards to justify the effort to continue maintaining this manual? If yes, who should become responsible for maintaining the Reference Manual after the SDT is disbanded?

   ☐ Yes

   ☒ No

   Comments: This manual has little usefulness in ERCOT.

4. Are you aware of any conflicts between the reference manual and any regulatory function, rule/order, tariff, rate schedule, legislative requirement or agreement? If yes, please explain your answer.

   ☒ Yes

   ☐ No

   Comments: The Market Rules that compose the agreement within ERCOT preclude the use of TLR.

5. Please provide any other comments you have (that you have not already provided in response to the above questions) regarding this draft reference manual.

   Comments: This document should be clearly titled as an "EASTERN INTERCONNECT" manual, not a global NERC manual. Although there are sections of this manual (particularly in section 3) which refer to WECC and ERCOT; the procedures incorporated are clearly the Eastern interconnection procedures. This manual does not have the global applicability which it seems to claim.

   This is obvious when you download the manual, and find it is described in the "Purpose/Industry Need" as "a joint effort to update the Eastern Interconnection TLR procedure. " NERC knows this is an eastern interconnection only document. We need to try and avoid it being the law for the entire United States.

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Individual Commenter Information **(Complete this page for comments from one organization or individual.)**		
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NERC Region (check all Regions in which your company operates)		**Registered Ballot Body Segment (check all industry segments in which your company is registered)**
☐ **ERCOT** ☐ **FRCC** ☐ **MRO** ☒ **NPCC** ☐ **RFC** ☐ **SERC** ☐ **SPP** ☐ **WECC** ☐ **NA – Not Applicable**	☐	1 — Transmission Owners
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2. The reference manual has been structured to show both the NERC and NAESB standards together, including reference numbers to the NERC and NAESB standards. Do you have any suggestions regarding numbering and referencing that would be more effective?

   Comments: The numbering is fine but the text for NAESB and text for NERc should be better demarcated. Instead of italics for NAESB, it could be better to use gray boxes with NAESB standards written inside, no need for italics then, a bolder font perhaps - this helps for clearer visbility as one could get lost in the numbers maze as is presently written.

3. The SDT expended a significant amount of effort to create this reference manual. Do you find this reference manual provides sufficient additional value to the established NERC and NAESB standards to justify the effort to continue maintaining this manual? If yes, who should become responsible for maintaining the Reference Manual after the SDT is disbanded?

   ☒ Yes

   ☐ No

   Comments: The document does provide a one-stop shop for all system operators and should be maintained in order to keep it current.

4. Are you aware of any conflicts between the reference manual and any regulatory function, rule/order, tariff, rate schedule, legislative requirement or agreement? If yes, please explain your answer.

   ☐ Yes

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   Comments:

   i) For each TLR level identified, there should only be 2 sub-sections - CONDITION (NERC standard) and ACTION (NAESB standard) - additional sub-sections like "Holding Procedures" are not required as these lead to unnecessary confusion - an example of this is as follows: For TLR Level 2, there is no reason why 3.2.5 of the NAESB Standard is under "Holding Procedures" (5.2.2.2) whereas similar

requirement for TLR Level 3A (3.3.1.2) is under "Actions" (5.2.3.2). Hence, we suggest that it would be easier to divide them as only "Conditions" as stipulated in the NERC IRO-006-4 Attachment and "Actions" as stipulated by the NAESB standards.

ii) Instead of italics for NAESB, it could be better to use gray boxes with NAESB standards written inside, no need for italics then, a bolder font perhaps - this helps for clearer visbility as one could get lost in the numbers maze as is presently written.

iii) The table of contents (TOC) should be expanded to one additional level at least. It becomes clearer for the reader to know that for #7 IDC Reference Document, it includes further discussions including how the IDC handles the reallocation process, timing considerations involved etc. An expanded tOC allows for a easier look-up.

iv) The glossary of terms, be it NERC or NAESB, should always be at the beginning of the document - terms are helpful in understanding the text of the document and placing them after the text or the meat of the document does not make real sense.

v) Good idead to provide the TLR flowchart in the beginning of the document. There is no need for NERC Appendix A which is at the end of the current document as it is the same flowchart.

vi) The list of NERC and NAESB appendices should be listed in the TOC in sequence and attached to the end of the manual, instead of trying to map it in the middle of the document - a separate list of notes could be added in the document expliaining the mapping - this helps in the readability of the document, makes it a complete "reference manual" rather than only as a mapping attempt.

Vii) In NAESB Appendix A, there seems to be a disconnect between the text and the illustration for case # 6.

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Individual Commenter Information **(Complete this page for comments from one organization or individual.)**		
Name:	Guy Zito	
Organization:	NPCC	
Telephone:	212-840-1070	
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NERC Region (check all Regions in which your company operates)		**Registered Ballot Body Segment (check all industry segments in which your company is registered)**
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Group Comments (Complete this page if comments are from a group.)

Group Name: NPCC Regional Standards Committee

Lead Contact: Guy Zito

Contact Organization: NPCC

Contact Segment: **Regional Standards**

Contact Telephone: 212--840-1070

Contact E-mail: Gzito@npcc.org

Additional Member Name	Additional Member Organization	Region*	Segment*
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Ralph Rufrano	New York Power Authority	NPCC	1, 3, 5, 6
David Kiguel	Hydro One	NPCC	1
Donald Nelson	Massachusetts Department of Public Utilities	NPCC	9
Ronald Hart	Dominion Resources, Inc.	NPCC	3, 6
Ben Li	Independent Electricity System Operator	NPCC	2
Brian Evans-Mongeon	Utility Services, LLC	NPCC	8
Murale Gopinathan	Northeast Utilities	NPCC	1
Michael Ranalli	National Grid	NPCC	1, 3
Biju Gopi	Independent Electricity System Operator	NPCC	2
William DeVries	New York Independent System Operator	NPCC	2
Kathleen Goodman	ISO New England	NPCC	2
Edwin Thompson	Consolidated Edison Company of New York, Inc.	NPCC	1, 3, 6
Sylvain Clermont	Hydro-One TransEnergie	NPCC	1, 3
Roger Champagne	Hydro-Quebec TransEnergie	NPCC	1
Alan Adamson	New York State Reliability Council	NPCC	10

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   Suggestion to add subheadings for Section 5.

3. The SDT expended a significant amount of effort to create this reference manual. Do you find this reference manual provides sufficient additional value to the established NERC and NAESB standards to justify the effort to continue maintaining this manual? If yes, who should become responsible for maintaining the Reference Manual after the SDT is disbanded?

   ☒ Yes

   ☐ No

   Comments: The document does provide a one-stop shop for all system operators and should be maintained in order to keep it current.

   Suggest that the NERC Manager of Business Practice Coordination be the caretaker of this document.

4. Are you aware of any conflicts between the reference manual and any regulatory function, rule/order, tariff, rate schedule, legislative requirement or agreement? If yes, please explain your answer.

   ☐ Yes

   ☒ No

   Comments:

5. Please provide any other comments you have (that you have not already provided in response to the above questions) regarding this draft reference manual.

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iv) The glossary of terms, be it NERC or NAESB, should always be at the beginning of the document - terms are helpful in understanding the text of the document and placing them after the text or the meat of the document does not make real sense.

v) Good idea to provide the TLR flowchart in the beginning of the document. There is no need for NERC Appendix A which is at the end of the current document as it is the same flowchart.

vi) The list of NERC and NAESB appendices should be listed in the TOC in sequence and attached to the end of the manual, instead of trying to map it in the middle of the document - a separate list of notes should be added in the document explaining the mapping - this helps in the readability of the document, makes it a complete "reference manual" rather than only as a mapping attempt.

vii) In NAESB Appendix A, there seems to be a disconnect between the text and the illustration for case # 6.

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NERC Region (check all Regions in which your company operates)		**Registered Ballot Body Segment (check all industry segments in which your company is registered)**
☒ **ERCOT** ☒ **FRCC** ☒ **MRO** ☒ **NPCC** ☒ **RFC** ☒ **SERC** ☒ **SPP** ☒ **WECC** ☐ **NA – Not Applicable**	☐	1 — Transmission Owners
	☐	2 — RTOs and ISOs
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	☐	10 — Regional Reliability Organizations and Regional Entities

Group Comments (Complete this page if comments are from a group.)

Group Name:

Lead Contact:

Contact Organization:

Contact Segment:

Contact Telephone:

Contact E-mail:

Additional Member Name	Additional Member Organization	Region*	Segment*

*If more than one Region or Segment applies, please list all that apply. Regional acronyms and segment numbers are shown on prior page.

Background Information

As part of the development of IRO-006-4, NERC and NAESB together developed the *Joint NERC/NAESB System Operator's TLR Reference Manual.* This manual is intended to aid system operators in implementing the NERC and NAESB standards related to the TLR process by consolidating both NERC and NAESB requirements within a single document.

While not a standard, NERC and NAESB are soliciting comments on the manual in an effort to ensure it meets industry needs and is as complete and accurate as possible. We thank you in advance for your assistance.

Based on industry comments, we will revise and submit this manual to the Standards Committee for approval to post the manual as a reliability standard "Supporting Document," with a link to IRO-006.

TLR Reference Manual Comment Form Questions

1. We have prepared this reference manual in response to stakeholder comments related to the NERC/NAESB split of IRO-006. Does the posted document meet your expectations? If not, please provide an explanation.

   ☐ Yes

   ☒ No

   Comments: NRG believes that it is difficult to separate the reliability and commerical apsects of TLRs and expected the manual to provide more extensive coverage of the commercial aspects. Specifically, the reference manual does not address the treatment of "internal schedules" (those with source/sink within same BA) and treatment of Qualified Facilities "put" power. Please see the additional comments offered below.

2. The reference manual has been structured to show both the NERC and NAESB standards together, including reference numbers to the NERC and NAESB standards. Do you have any suggestions regarding numbering and referencing that would be more effective?

   Comments: For items excluded from IRO-006-03, it would be beneficial for there to be cross referencing in IRO-006-04 to the location in the manual where these items are treated.

3. The SDT expended a significant amount of effort to create this reference manual. Do you find this reference manual provides sufficient additional value to the established NERC and NAESB standards to justify the effort to continue maintaining this manual? If yes, who should become responsible for maintaining the Reference Manual after the SDT is disbanded?

   ☒ Yes

   ☐ No

   Comments: The responsibility should remain with both NERC and NAESB to insure that both the reliability and commercial aspects of TRLs is coordinated.

4. Are you aware of any conflicts between the reference manual and any regulatory function, rule/order, tariff, rate schedule, legislative requirement or agreement? If yes, please explain your answer.

   ☒ Yes

   ☐ No

Comments: IRO-006-03 section 2.6.2 Step 2, on Reallocation procedures states,"the RC shall calculate the percentage of the overload on the constrained facility caused by both firm point to point transmission service and the transmission provider's network integration transmission service and native load." In IRO-006-04, this section appears assigned to the manual under section 5.1.6.6. Within this section, the inclusion of services evaluated defaults to NAESB 3.11 which reads, "the RC intitiating a curtailment shall identify for curtailment all firm transmission services (i.e. PTP, NI and service to NL) that contribute to the flow on any constrained facility or flowgate ..." As written, NRG believes NAESB 3.11 eliminates the inclusion of non-firm service during Reallocation procedures (i.e., NN6

priority oasis or grandfathered Oasis which Transmission Owners consider as non-firm service.)

5. Please provide any other comments you have (that you have not already provided in response to the above questions) regarding this draft reference manual.

   Comments: As noted in the Background section of the manual, it was recognized that the TRL procedure is to be "implemented equally and without bias to all parties involved". Clarification on the application of this manual's procedures to two situations is needed: controlling for the effects of "put" power off QFs (i.e., power from QFs in excess of host load requirements which is "put" onto the transmission network), and RC's responsibilities and requirements for controlling for the impacts off internal schedules. Additionally, NRG believes that the procedures relating to NNL obligations, as written in the manual, could result in an interpretation which violates the order of priority for service curtailment.

   Qualified Facilities
   FERC Order No 696, finalized in May 2007, eliminated exemption of QFs from section 215 of EPAct. FERC states in the Order's introduction, "there is not a meaningful distinction between QF and non-QF generators that warrants a generic exemption of the QFs from reliability standards. FERC provided parameters for those units affected, and in its study found 745 or the 3265 QFs in the "universe of qualifying facilities" would fall under established reliability standards. What FERC did not elaborate upon, which we feel should be addressed in this document, is how "put" power should be treated within context of this reliability standard. Is "put" power exempt from the TLR process?

   To the extent generators affected by Order 696 are not exempt from the TLR process, where in the standard is the unique nature of "put" power addressed? We recognize RCs can capture the effects through Local Area Processes. Once scale of required relief is elevated to SOL or IROL status, what responsibilities do RCs have to include QF generation into the solution matrix; what tools are available to measure their required relief? Although the standard generally grants RCs the ability to mitigate SOL and IROL violations and provides specific guidance regarding Interchange Transactions and NNL obligations, we contend the current procedures heavily rely upon associating power flows with an Oasis reservation. Although these procedures might allow reliability obligations to be met, we question their merits on equitably distributing the responsibility.

   Since "put" power does not have an associated Oasis reservation, and relief options for inter-connection wide violations are primarily provided by IDC results, RCs face the challenge of reconciling the impacts from QF generation within the functional limits of the IDC. With the absence of Oasis reservations, the IDC cannot evaluate these flows in similar fashion to Interchange Schedules (These flows are not Interchange Schedules since they have source/sinks within the same BA.)
   We also question whether flows off QF "put" power can be evaluated in a BA's NNL obligations under the manual's current language. Section 3.11.2 outlines the procedure for RCs to determine NNL obligations for BAs. The procedure allows RCs to use Network Integrated Transmission Service and service to Native Load in calculations. Does "service", referenced in manual, include "put" power, or does it only refer to service for which an Oasis reservation has been granted? To the extent QF generation should be controlled for in NNL obligations, clarification on the definition of "service" is central to providing a standardized process. Otherwise, inclusion of QFs into a BA's NNL obligations is left to the individual interpretations of

RCs or QF "put" power is excluded altogether despite its impact on transmission constraints.

Sufficient need exists for the manual to specifically address RC's obligations and/or limitations regarding QF "put" power under this standard. The proposed section might include attention to technical considerations created by the absence of Oasis. Since PURPA grants QFs unique rights, and potential reliability obligations generated under Order 696 are relatively new, we believe there is insufficient precedent available to RCs; especially, when faced with legal obligations that differ from non-QF generation. Technical guidance which bounds the reliability obligations against the rights of QF "put" power provides RCs a more uniform method to comply with the standard. Excluding such detailed guidance risks an interpretation by the RC which may violate the goal of distributing reliability obligations "without bias to all parties involved."

Internal Schedules

For purposes of these comments, we are referring to internal schedules as E-tags that have a corresponding Oasis reservation with a source and sink contained within the same BA. It has come to our attention that BAs which contain a number of generators not owned by the hosting BA, such as IPPs, may present RCs with challenges when complying with this standard. We believe in certain regions, these internal schedules are significant enough to justify for the manual to provide specific guidance to RCs on obligations to include the flowgate impacts from these schedules, and potential technical considerations on how these impacts should be measured and controlled. To clarify the situation surrounding internal schedules, consider the following example.

A 500 mw IPP generator resides in BA "X" and sells this power on an hourly basis to load also residing in BA "X". This 500 mw facility is not considered a designated network resource and is not figured into the network customers long term resources. This internal resource has an associated E-tag and has acquired an Oasis reservation designating the source and sink. Since this E-tag has the same POD/POR it, is not considered an interchange transaction by the IDC. Are the impacts of this flow to be included within the network loads NNL obligations? If so, how is this designation to be made within the IDC calculator? Currently, the IDC refers to the Generator to Load Distribution Factors (GLDF) in determining NNL obligations. The GLDF assigns a percentage ownership to the generating resources serving the network load. This system appears to work provided the network load customer has ownership interest in the units servicing its load. However, flows off IPP units servicing network load are independently owned. Hence, network loads are liable to have their NNL obligations understated by showing zero ownership in the GLDF portion of the IDC calculation for power servicing their load off IPP units. The amount of relief required to mitigate a flowgate constraint in aggregate is not reduced, but the relief responsibilities determined for each network load customer will be biased. Hence, IPP purchases to service network load, allows for a situation where the host NNL obligations are understated; thereby overstating the NNL obligations for neighboring network load customers.

To the extent RCs are required by the standard to include impacts from internal schedules, and that inclusion requires "unbiased" distribution of those obligations as NNL relief, we contend opportunity exist which elevates the considerations placed on non-firm service to those afforded firm service priority. For internal schedules which utilize non-firm network import (NN6), we believe the manual's language does not provide guidance regarding their inclusion during NNL obligations. Since relief from

NNL obligations are triggered during Level 5 TLRs, situations can occur where non-firm network service associated with Interchange schedules will have been curtailed during Level 3 TLRs, yet non-firm network service associated with internal schedules are not controlled during Level 3 TLR. To the extent these internal schedules flowing on non-firm network service are accounted for during NNL procedures, these flows are evaluated along with firm network schedules servicing the network load. During the Level 5 TLR stage, these non-firms Oasis are not evaluated until the same time as Interchange Schedules with firm Oasis. Is the intent of the standard to grant internal schedules on non-firm Oasis the same priority as firm service? We contend that current language in manual allows for this situation for internal schedules using non-firm network service. If there exist within the TLR process a procedure where non-firm internal schedules should be accounted,for besides within the NNL obligations of a network load customer, we believe the manual should provide specific guidance towards.

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Individual Commenter Information **(Complete this page for comments from one organization or individual.)**		
Name:		
Organization:		
Telephone:		
E-mail:		
NERC Region (check all Regions in which your company operates)		**Registered Ballot Body Segment (check all industry segments in which your company is registered)**
☐ **ERCOT** ☐ **FRCC** ☐ **MRO** ☐ **NPCC** ☐ **RFC** ☒ **SERC** ☐ **SPP** ☐ **WECC** ☐ **NA – Not Applicable**	☒	1 — Transmission Owners
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Group Comments (Complete this page if comments are from a group.)

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Doug McLaughlin	Southern Company Services	SERC	1

*If more than one Region or Segment applies, please list all that apply. Regional acronyms and segment numbers are shown on prior page.

Background Information

As part of the development of IRO-006-4, NERC and NAESB together developed the *Joint NERC/NAESB System Operator's TLR Reference Manual.* This manual is intended to aid system operators in implementing the NERC and NAESB standards related to the TLR process by consolidating both NERC and NAESB requirements within a single document.

While not a standard, NERC and NAESB are soliciting comments on the manual in an effort to ensure it meets industry needs and is as complete and accurate as possible. We thank you in advance for your assistance.

Based on industry comments, we will revise and submit this manual to the Standards Committee for approval to post the manual as a reliability standard "Supporting Document," with a link to IRO-006.

TLR Reference Manual Comment Form Questions

1. We have prepared this reference manual in response to stakeholder comments related to the NERC/NAESB split of IRO-006. Does the posted document meet your expectations? If not, please provide an explanation.

   ☒ Yes

   ☐ No

   Comments: As a reference for System Operators, the document is a little difficult to read for comprehension. Also see Comment #2b for Question #5.

2. The reference manual has been structured to show both the NERC and NAESB standards together, including reference numbers to the NERC and NAESB standards. Do you have any suggestions regarding numbering and referencing that would be more effective?

   Comments: The incorporation of the NAESB TLR Business Practice Standards within the NERC TLR Reliability Standard, while maintaining both sets of index numbers, is obviously difficult. We do not know of a better way to index the Reference Manual without affecting either set of index numbers.

   We recommend that the SDT expand the Manual's Table of Contents to make it easier to locate TLR levels. The addition of quick-links to TLR levels would be beneficial to a System Operator.

3. The SDT expended a significant amount of effort to create this reference manual. Do you find this reference manual provides sufficient additional value to the established NERC and NAESB standards to justify the effort to continue maintaining this manual? If yes, who should become responsible for maintaining the Reference Manual after the SDT is disbanded?

   ☒ Yes

   ☐ No

   Comments: Yes, the reference manual should either be maintained by NERC or by FERC.

4. Are you aware of any conflicts between the reference manual and any regulatory function, rule/order, tariff, rate schedule, legislative requirement or agreement? If yes, please explain your answer.

   ☐ Yes

   ☒ No

   Comments:

5. Please provide any other comments you have (that you have not already provided in response to the above questions) regarding this draft reference manual.

   Comments:
   1. Overall it appears that the drafting team did a good job in combining the content of both the standards into a single reference manual. Most of our

comments/observations are related to the content of either the NERC standard or the NAESB standard and not related to the way this particular document is structured.

2. Comments related to the document itself:
a. The flow chart on page 5 is a little difficult to read; I would suggest removal of the curves in the outer return paths.
b. The document itself has a lot of sub-bullets and references to other documents making it a little difficult to use a reference manual in finding a complete answer to a question quickly. However, since two ANSI standards are involved I can't think of a better way to present the material without re-wording the original standards.

3. Comments related to the standards:
a. Section 4.1.4 page 10:
If or when the SCA RC declares a TLR we will need to archive the real-time contingency monitor contingencies and their designations (R, P, etc…) for 18 months. It may be well that we go ahead and set a data retention policy for this data to 18 months.
b. Section 5.1.2 on page 13:
"A Reliability Coordinator may utilize the TLR Procedure to mitigate potential or existing System Operating Limit (SOL) violations or to prevent Interconnection Reliability Operating Limit (IROL) violations on any transmission facility modeled in the IDC. However, the TLR procedure is an inappropriate and ineffective tool as a sole means to mitigate existing IROL violations. Effective alternatives to the use of the TLR procedure in situations involving an existing IROL violation include: reconfiguration, re-dispatch, and load shedding outside the TLR process."
This falls short of saying that you must, or even should, implement local procedures prior to issuing a TLR and this is the only section of the document which specially addresses alternatives to issuing TLRs. There are however several parts of the document which address using local procedures addition to use of TLRs (section 1.2 page 15)
c. Section 3.3.5.2 on page 26 states that:
"Interchange Transactions with sub-priority S2 shall be allowed to reload to the lesser of its current hour MW level or the MW level specified in the schedule for the upcoming hour. For calculated values less than zero, zero shall be used."
This supports the RC's direction that reloads initiated by the IDC should be accepted even if they are off-hour reloads.

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Individual Commenter Information **(Complete this page for comments from one organization or individual.)**		
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NERC Region (check all Regions in which your company operates)		**Registered Ballot Body Segment (check all industry segments in which your company is registered)**
☐ **ERCOT** ☐ **FRCC** ☐ **MRO** ☐ **NPCC** ☐ **RFC** ☐ **SERC** ☒ **SPP** ☐ **WECC** ☐ **NA – Not Applicable**	☒	1 — Transmission Owners
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Group Comments (Complete this page if comments are from a group.)

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Mike Gammon	Kansas City Power & Light	SPP	1,3,5
Allen Klassen	Westar Energy	SPP	1,3,5
Kyle McMenamin	Southwestern Public Service	SPP	1,3,5
Fred Meyer	Empire District Electric	SPP	1,3,5
Mike Murray	City Power & Light (Independence, MO)	SPP	1,3,5
Robert Rhodes	Southwest Power Pool	SPP	2
Jason Smith	Southwest Power Pool	SPP	2

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Background Information

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Based on industry comments, we will revise and submit this manual to the Standards Committee for approval to post the manual as a reliability standard "Supporting Document," with a link to IRO-006.

TLR Reference Manual Comment Form Questions

1. We have prepared this reference manual in response to stakeholder comments related to the NERC/NAESB split of IRO-006. Does the posted document meet your expectations? If not, please provide an explanation.

   ☐ Yes

   ☒ No

   Comments: In general we were fairly comfortable with the split as it existed therefore we really didn't have any expectations regarding the recombination of the NERC and NAESB documents.

2. The reference manual has been structured to show both the NERC and NAESB standards together, including reference numbers to the NERC and NAESB standards. Do you have any suggestions regarding numbering and referencing that would be more effective?

   Comments: The numbering system, although a bit cumbersome, probably is needed for reference and clarification. We don't have a better alternative.

3. The SDT expended a significant amount of effort to create this reference manual. Do you find this reference manual provides sufficient additional value to the established NERC and NAESB standards to justify the effort to continue maintaining this manual? If yes, who should become responsible for maintaining the Reference Manual after the SDT is disbanded?

   ☐ Yes

   ☒ No

   Comments: Apparently, if there was sufficient stakeholder comment to warrant the recombination effort, there will more than likely be similar requests to maintain it although we do not necessarily hold that opinion. If the document is to be maintained, we concur with the maintenance process outlined on page 4 of the document.

4. Are you aware of any conflicts between the reference manual and any regulatory function, rule/order, tariff, rate schedule, legislative requirement or agreement? If yes, please explain your answer.

   ☐ Yes

   ☒ No

   Comments:

5. Please provide any other comments you have (that you have not already provided in response to the above questions) regarding this draft reference manual.

   Comments: Section 5.1.8 - The first parenthetical phrase should be deleted. While the NERC TLR Log is automatically opened when a TLR above a Level 2 is issued, the process does require manual intervention by the RC to enter loading and other information. Otherwise when the Level 0 is issued the Log is closed and sent to NERC without being filled out completely.

Section 5.1.9 - There are a couple of yellow boxes in this section asking what to do with the NERC Market Committee reference. Comments in red indicate that the references will be removed. Why weren't they?

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NERC Region (check all Regions in which your company operates)		**Registered Ballot Body Segment (check all industry segments in which your company is registered)**
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   ☒ Yes

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   Comments:

2. The reference manual has been structured to show both the NERC and NAESB standards together, including reference numbers to the NERC and NAESB standards. Do you have any suggestions regarding numbering and referencing that would be more effective?

   Comments: none

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   ☒ Yes

   ☐ No

   Comments: Joint task force

4. Are you aware of any conflicts between the reference manual and any regulatory function, rule/order, tariff, rate schedule, legislative requirement or agreement? If yes, please explain your answer.

   ☐ Yes

   ☒ No

   Comments:

5. Please provide any other comments you have (that you have not already provided in response to the above questions) regarding this draft reference manual.

   Comments: None