Comment Form — Draft Standard IRO-006-4 — Reliability Coordination — Transmission Loading Relief

Please use this form to submit comments on the first draft of the TLR procedure NERC/NAESB split for the Eastern Interconnection (IRO-006-4 — Reliability Coordination — Transmission Loading Relief – Attachment 1). Comments must be submitted by **June 14, 2007**. You must submit the completed form by e-mail to sarcomm@nerc.net with the words "**NERC/NAESB TLR Split**" in the subject line. If you have questions please contact Andy Rodriquez at andy.rodriquez@nerc.net or 609-947-3885.

Individual Commenter Information (Complete this page for comments from one organization or individual.)		
Name:	Thad K. Ness	
Organization:	American Electric Power (AEP)	
Telephone:	614-716-2053	
E-mail:	tkness@aep.com	
NERC Region		**Registered Ballot Body Segment**
☒ **ERCOT** ☐ **FRCC** ☐ **MRO** ☐ **NPCC** ☒ **RFC** ☐ **SERC** ☒ **SPP** ☐ **WECC** ☐ **NA – Not Applicable**	☒	1 — Transmission Owners
	☐	2 — RTOs and ISOs
	☐	3 — Load-serving Entities
	☐	4 — Transmission-dependent Utilities
	☒	5 — Electric Generators
	☒	6 — Electricity Brokers, Aggregators, and Marketers
	☐	7 — Large Electricity End Users
	☐	8 — Small Electricity End Users
	☐	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, indicate the best fit for the purpose of these comments. Regional acronyms and segment numbers are shown on the prior page.

Background Information

NERC and the North American Energy Standards Board (NAESB) last year finalized a procedure for coordinating the development of standards in areas that affect both reliability and business practices, such as power interchange and congestion management. This approach allows the reliability requirements to be developed through the NERC process and the business practices to be developed through the NAESB process, with the actual development work being done by a joint team sponsored by NERC and NAESB.

Thus the standards will be separate but closely integrated. This approach is more effective than previous efforts that assigned standards to either NERC or NAESB when the subject matter obviously contains both reliability and business practice elements.

On June 1–2, 2005, following an extensive joint process, the NERC NAESB TLR Subcommittee completed a review of and recommended split of both reliability and business practice requirements of the NERC TLR standard IRO-006.

NAESB completed its ratification of its respective TLR business practices[1] on April 10, 2006, with updates for an SPP regional difference and changes to TLR Levels 3b and 4 ratified on September 1, 2006.

Following completion of its SAR process, NERC formed a TLR Drafting Team in August 2006. The NERC TLR Drafting Team has been meeting jointly with the NAESB Wholesale Electric Quadrant (WEQ) Business Practices Subcommittee to complete the respective changes to the NERC TLR standard IRO-006 to document the previously agreed-upon NERC/NAESB split of the TLR requirements. In addition, the team has also developed measures, compliance elements and other standard elements to meet the requirements of the NERC Reliability Standards Development Procedure.

In conducting this work, the team attempted to retain the original IRO-006 requirements to the extent possible to avoid creating new elements that may precipitate lengthy debates hence delaying implementing the NERC/NAESB split. However, where in the judgment of the team the standard requirements as written were deemed to create difficulties in developing the necessary measures and compliance elements, the team modified the requirements to achieve those objectives.

The comment form is asking for comments ONLY on the changes to the draft NERC standard. The sections highlighted[2] in the mapping document for the draft standard are being recommended for retirement from the NERC TLR standard.

As part of the project plan for this effort, the drafting team envisions creating a joint operators' manual that will contain both the NERC and NAESB portions of the TLR procedure.

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[1] Please access http://naesb.org/misc/fa_weq_r06002_attachment%20_2_.pdf to review the NAESB TLR Business Practice Standards in conjunction with the proposed NERC TLR Reliability Standards to ensure that all relevant aspects of TLR standards are either included in the NERC proposal or in the NAESB business practices. Please note that the NAESB business practice standards are copyright protected. Should you need to obtain a copy of the NAESB standards for other purposes, please contact the NAESB office.

[2] In the mapping of the NERC/NAESB TLR split, the following key is being used: Yellow — recommended for transfer to a new Attachment 2 in future work on the standard, Gray — agreed as being part of the NAESB Business Practices, Blue — to be deleted as obsolete in future work on the standard.

Note that you do not have to answer all questions.

1. Do you agree that the new "Purpose" statement captures the intent of the standard? If not, please explain your answer.

   The original purpose stated "Regardless of the process it uses, the Reliability Coordinator must direct its Balancing Authorities and Transmission Operators to return the transmission system to within its Interconnection Reliability Operating Limits as soon as possible, but no longer than 30 minutes. The Reliability Coordinator needs to direct Balancing Authorities and Transmission Operators to execute actions such as reconfiguration, redispatch, or load shedding until relief requested by the TLR process is achieved."

   The new purpose states "The purpose of this standard is to provide a method to prevent and or manage congestion on the Bulk Electric System."

   ☒ Yes

   ☐ No

   Comments: IRO-005-2 deals with current day operations. IRO-005-2 R3, R16, and R17 all deal with the IROL violation issue and taking appropriate action to relieve the violation within 30 minutes.

   IRO-005-2 R3: As portions of the transmission system approach or exceed SOLs or IROLs, the Reliability Coordinator shall work with its Transmission Operators and Balancing Authorities to evaluate and assess any additional Interchange Schedules that would violate those limits. If a potential or actual IROL violation cannot be avoided through proactive intervention, the Reliability Coordinator shall initiate control actions or emergency procedures to relieve the violation without delay, and no longer than 30 minutes. The Reliability Coordinator shall ensure all resources, including load shedding, are available to address a potential or actual IROL violation.

   IRO-005-2 R16: Each Reliability Coordinator shall confirm reliability assessment results and determine the effects within its own and adjacent Reliability Coordinator Areas. The Reliability Coordinator shall discuss options to mitigate potential or actual SOL or IROL violations and take actions as necessary to always act in the best interests of the Interconnection at all times.

   IRO-005-2 R17: When an IROL or SOL is exceeded, the Reliability Coordinator shall evaluate the local and wide-area impacts, both real-time and post-contingency, and determine if the actions being taken are appropriate and sufficient to return the system to within IROL in thirty minutes. If the actions being taken are not appropriate or sufficient, the Reliability Coordinator shall direct the Transmission Operator, Balancing Authority, Generator Operator, or Load-Serving Entity to return the system to within IROL or SOL.

2. In order to develop appropriate measures and compliance elements for the requirements and hold the applicable reliability functions responsible for meeting these requirements, the team has removed Transmission Operator from the applicability list on the basis that the requirements in IRO-006-3 that apply to the Transmission Operators are either not applicable (Section 1.6.3, Attachment 1) or already covered by other standards (Sections

1.8.1 and 2.9.2, Attachment 1). Do you agree with the applicable entities defined in the standard? If not, please specify to which entities the standard should apply.

☒ Yes

☐ No

Comments:

3. The intent of the revised standard is to capture the reliability requirements of the former TLR procedure following the NERC/NAESB split. Do you agree that the draft revisions to the standard and Attachment 1 accomplished this objective? If not, please explain your answer.

☒ Yes

☐ No

Comments:

4. Do you agree with the violation risk factors proposed in the standard? If not, please explain your answer.

☒ Yes

☐ No

Comments:

5. Do you agree with the time horizons proposed in the standard? The drafting team was given the following criteria to use in assigning a "time horizon." Note that time horizons are used as one component in determining the size of a sanction. More information about time horizons can be found in the Sanctions Guidelines.

   - Long-term Planning — a planning horizon of one year or longer.
   - Operations Planning — operating and resource plans from day-ahead up to and including seasonal.
   - Same-day Operations — routine actions required within the timeframe of a day, but not real-time.
   - Real-time Operations — actions required within one hour or less to preserve the reliability of the Bulk Electric System.
   - Operations Assessment — follow-up evaluations and reporting of real time operations.

   If not, please explain your answer.

   ☒ Yes

   ☐ No

   Comments:

6. Do you agree with the measures proposed in the standard? If not, please explain your answer.

☒ Yes

☐ No

Comments:

7. Do you agree with the compliance elements proposed in the standard? If not, please explain your answer.

   ☐ Yes

   ☒ No

   Comments: The Violation Severity Levels do not make sense, especially those for the Eastern Interconnection. What is the rationale for the selection of 2-3 procedural violations being moderate and 4-5 being high and 6 or more being severe? For ERCOT and the Western Interconnection, not following just one procedural requirement is a severe violation. Also, for the east, is the SDT stating that all the requirements in Attachment 1 are of equal weight, hence the 2-3, and 4-5, etc. division? The SDT needs to review these one more time.

   For 2.3.2, this should be moved to the lower category and made 2.1.3 once R4 is cleaned up. The requirement it references, R4, is unclear. Each Interconnection has their own Interconnection-wide procedure. So when curtailing an Interchange Transaction that crosses an Interconnection boundary, which Interconnection-wide procedure are the initiating and responding RC to use, the one in the initiating RC's interconnection or the one in the responding RC's interconnection?

   2.4.4 should be restated as follows: While attempting to mitigate an existing IROL violation in the Eastern Interconnection, the Reliability Coordinator only applied TLR Levels 5 and lower as the sole remedy for an existing IROL violation.

   In the situation under 2.4.4, the appropriate action for the RC to take is to issue a TLR Level 6 - Emergency Procedures, which provides for the RC to redispatch generation, reconfigure transmission, or reduce load to mitigate the critical condition, which an IROL violation is. See 2.9 of Attachment 1 to IRO-006-4 for reference.

8. The drafting team is planning a joint NERC NAESB TLR operator's manual for the TLR procedure. What would your organization like to see contained in a joint manual?

   Comments: No comment.

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

   ☐ Yes

   ☒ No

   Comments:

10. Do you have any concerns that would prevent you from voting to approve this draft standard? If yes, please explain your answer.

☒ Yes

☐ No

Comments: Yes, see our comments to Q#7 and Q#11.

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

Comments: For the Standard, IRO-006-4:

R1.1 - Delete the following: "TLR procedure alone is an inappropriate and ineffective tool to mitigate an IROL violation. Other acceptable and more effective procedures to mitigate actual IROL violations include: reconfiguration, redispatch, or load shedding." This is a incorrect statement. The Eastern Interconnection TLR procedure includes TLR Level 6 - Emergency Procedures, which provides for the RC to redispatch generation, reconfigure transmission, or reduce load to mitigate the critical condition, which an IROL violation is. See 2.9 of Attachment 1 to IRO-006-4 for reference. TLR Level 6 is an often forgotten element of the TLR procedure, but is does exist and is perfect for the situation sited.

For Attachment 1:

1.2 - Delete the following: "However, the TLR procedure is an inappropriate and ineffective tool as a sole means to mitigate existing IROL violations due to the time required to implement the procedure. Reconfiguration, redispatch, and load shedding are more timely and effective in mitigating existing IROL violations." This is an incorrect statement for the reason sited above in R1.1. It is interesting to note that in 1.3 of Attachment 1 acknowledges our position by stating that "Furthermore, if a Reliability Coordinator deems that a transmission loading condition could jeopardize Bulk Electric System reliability, the Reliability Coordinator shall have the authority to enter TLR Level 6 directly, and immediately direct the Balancing Authorities or Transmission Operators to take such actions as redispatching generation, or reconfiguring transmission, or reducing load to mitigate the critical condition until Interchange Transactions can be reduced utilizing the TLR Procedure or other methods to return the system to a secure state." As TLR Level 6 is part of the TLR procedures, and TLR Level 6 is for directing immediate reconfiguration, redispatch, or load shedding, then the TLR procedure is an effective tool to mitigate IROL violations.

3.0 TLR Level 0 - This is numbered incorrectly. It is part of section 2, thus should be numbered 2.10, and 3.0.1 should be numbered 2.10.1.

Under the heading Requirements on pg. 7, 4.1 to 4.5 were part of former section 7, Interchange Transaction Curtailments During TLR Level 3B. If these requirements are to stay, then this heading should be used again, and they should be numbered section 3. However, we question why these remain. All but 4.5 appear to be related to the business practice side of TLR, thus they should go to NAESB.

Appendix A - This is very out of date. NERC has not used the term OSL violation for years. This chart needs to be updated to the present terminology, using IROL and SOL, not OSL and Security Limit Violation.

Comment Form — Draft Standard IRO-006-4 — Reliability Coordination — Transmission Loading Relief

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Individual Commenter Information (Complete this page for comments from one organization or individual.)		
Name:	Bill Lohrman	
Organization:	Prague Power, LLC	
Telephone:	908-630-0289	
E-mail:	wwlohrman@praguepower.com	
NERC Region		**Registered Ballot Body Segment**
☐ **ERCOT** ☐ **FRCC** ☐ **MRO** ☐ **NPCC** ☐ **RFC** ☐ **SERC** ☐ **SPP** ☐ **WECC** ☒ **NA – Not Applicable**	☐	1 — Transmission Owners
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Lead Contact:

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Additional Member Name	Additional Member Organization	Region*	Segment*

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   The new purpose states "The purpose of this standard is to provide a method to prevent and or manage congestion on the Bulk Electric System."

   ☒ Yes

   ☐ No

   Comments:

2. In order to develop appropriate measures and compliance elements for the requirements and hold the applicable reliability functions responsible for meeting these requirements, the team has removed Transmission Operator from the applicability list on the basis that the requirements in IRO-006-3 that apply to the Transmission Operators are either not applicable (Section 1.6.3, Attachment 1) or already covered by other standards (Sections 1.8.1 and 2.9.2, Attachment 1). Do you agree with the applicable entities defined in the standard? If not, please specify to which entities the standard should apply.

   ☒ Yes

   ☐ No

   Comments:

3. The intent of the revised standard is to capture the reliability requirements of the former TLR procedure following the NERC/NAESB split. Do you agree that the draft revisions to the standard and Attachment 1 accomplished this objective? If not, please explain your answer.

   ☒ Yes

   ☐ No

   Comments:

4. Do you agree with the violation risk factors proposed in the standard? If not, please explain your answer.

   ☒ Yes

   ☐ No

   Comments:

5. Do you agree with the time horizons proposed in the standard? The drafting team was given the following criteria to use in assigning a "time horizon." Note that time horizons are used as one component in determining the size of a sanction. More information about time horizons can be found in the Sanctions Guidelines.

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   - Operations Assessment — follow-up evaluations and reporting of real time operations.

   If not, please explain your answer.

   ☒ Yes

   ☐ No

   Comments:

6. Do you agree with the measures proposed in the standard? If not, please explain your answer.

   ☒ Yes

   ☐ No

   Comments:

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   ☒ Yes

   ☐ No

   Comments:

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   Comments: A consistent flow of interwoven NERC and NAESB TLR requirements, clearly delinated (e.g. different fonts or shading) as to which organization is responsible for the development and maintenance of the respective requirements.

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

   ☐ Yes

   ☒ No

Comments:

10. Do you have any concerns that would prevent you from voting to approve this draft standard? If yes, please explain your answer.

    ☐ Yes

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    Comments:

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    Comments: n/a

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Individual Commenter Information (Complete this page for comments from one organization or individual.)		
Name:	Steve Myers	
Organization:	ERCOT	
Telephone:	512-248-3077	
E-mail:	smyers@ercot.com	
NERC Region		**Registered Ballot Body Segment**
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   ☒ Yes

   ☐ No

   Comments:

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   Comments:

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   ☒ Yes

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   Comments:

4. Do you agree with the violation risk factors proposed in the standard? If not, please explain your answer.

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   If not, please explain your answer.

   ☒ Yes

   ☐ No

   Comments:

6. Do you agree with the measures proposed in the standard? If not, please explain your answer.

   ☒ Yes

   ☐ No

   Comments:

7. Do you agree with the compliance elements proposed in the standard? If not, please explain your answer.

   ☐ Yes

   ☒ No

   Comments: The Violation Severity Levels seemingly could be interpreted in more than one way. This should be clarified before approval. Do the numbers apply per event or to a total by month? Also, there appears to be no differentiation between minor and major infractions.

   The severity level of high for 2.3.2 seems to be too high and it should be a moderate level violation. It seems inconsistent that within an interconnection several requirements may be violated (2.2) but in an across interconnection situation only 1 violation is required to be a high severity. The TLR will only be applicable to one Interconnection as there are no AC connections between interconncetions. Therfore it should be treated the same with regard to severity as if it did not cross the boundry.

8. The drafting team is planning a joint NERC NAESB TLR operator's manual for the TLR procedure. What would your organization like to see contained in a joint manual?

Comments: The Reliability Standard should flow as it currently does. The attachment (manual) should flow so that the TLR process is logical for both Business and Reliability organizations to follow. It is recommended that both NERC and NAESB versions of the standard contain the complete joint proceedure. This is so that the industry always has the correct complete version. The current version of the approved Business and Reliability Standard should be referred to by the procedure. The attachement (manual) containing the TLR procedure should highlight the Reliability steps so that they are distinguishable from the Business steps.

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

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   ☒ No

   Comments:

10. Do you have any concerns that would prevent you from voting to approve this draft standard? If yes, please explain your answer.

    ☒ Yes

    ☒ No

    Comments: Only the concerns expressed with regard to Question 7 regarding Violation Severity Levels.

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

    Comments:

Comment Form — Draft Standard IRO-006-4 — Reliability Coordination — Transmission Loading Relief

Please use this form to submit comments on the first draft of the TLR procedure NERC/NAESB split for the Eastern Interconnection (IRO-006-4 — Reliability Coordination — Transmission Loading Relief – Attachment 1). Comments must be submitted by **June 14, 2007**. You must submit the completed form by e-mail to sarcomm@nerc.net with the words "**NERC / NAESB TLR Split**" in the subject line. If you have questions please contact Andy Rodriquez at andy.rodriquez@nerc.net or 609-947-3885.

Individual Commenter Information (Complete this page for comments from one organization or individual.)		
Name:		
Organization:		
Telephone:		
E-mail:		
NERC Region		**Registered Ballot Body Segment**
☐ **ERCOT** ☐ **FRCC** ☐ **MRO** ☐ **NPCC** ☐ **RFC** ☐ **SERC** ☐ **SPP** ☐ **WECC** ☐ **NA – Not Applicable**	☐	1 — Transmission Owners
	☐	2 — RTOs and ISOs
	☐	3 — Load-serving Entities
	☐	4 — Transmission-dependent Utilities
	☐	5 — Electric Generators
	☐	6 — Electricity Brokers, Aggregators, and Marketers
	☐	7 — Large Electricity End Users
	☐	8 — Small Electricity End Users
	☐	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: Public Service Commission of South Carolina

Lead Contact: **Phil Riley**

Contact Organization: **Public Service Commission of South Carolina**

Contact Segment: **9**

Contact Telephone: **803-896-5154**

Contact E-mail: **philip.riley@psc.sc.gov**

Additional Member Name	Additional Member Organization	Region*	Segment*
Mignon L. Clyburn	Public Service Commission of SC	SERC	9
Elizabeth B. "Lib" Fleming	Public Service Commission of SC	SERC	9
G. O'Neal Hamilton	Public Service Commission of SC	SERC	9
John E. "Butch" Howard	Public Service Commission of SC	SERC	9
Randy Mitchell	Public Service Commission of SC	SERC	9
C. Robert "Bob" Moseley	Public Service Commission of SC	SERC	9
David A. Wright	Public Service Commission of SC	SERC	9

*If more than one Region or Segment applies, indicate the best fit for the purpose of these comments. Regional acronyms and segment numbers are shown on the prior page.

Background Information

NERC and the North American Energy Standards Board (NAESB) last year finalized a procedure for coordinating the development of standards in areas that affect both reliability and business practices, such as power interchange and congestion management. This approach allows the reliability requirements to be developed through the NERC process and the business practices to be developed through the NAESB process, with the actual development work being done by a joint team sponsored by NERC and NAESB.

Thus the standards will be separate but closely integrated. This approach is more effective than previous efforts that assigned standards to either NERC or NAESB when the subject matter obviously contains both reliability and business practice elements.

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NAESB completed its ratification of its respective TLR business practices[1] on April 10, 2006, with updates for an SPP regional difference and changes to TLR Levels 3b and 4 ratified on September 1, 2006.

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In conducting this work, the team attempted to retain the original IRO-006 requirements to the extent possible to avoid creating new elements that may precipitate lengthy debates hence delaying implementing the NERC/NAESB split. However, where in the judgment of the team the standard requirements as written were deemed to create difficulties in developing the necessary measures and compliance elements, the team modified the requirements to achieve those objectives.

The comment form is asking for comments ONLY on the changes to the draft NERC standard. The sections highlighted[2] in the mapping document for the draft standard are being recommended for retirement from the NERC TLR standard.

As part of the project plan for this effort, the drafting team envisions creating a joint operators' manual that will contain both the NERC and NAESB portions of the TLR procedure.

---

[1] Please access http://naesb.org/misc/fa_weq_r06002_attachment%20_2_.pdf to review the NAESB TLR Business Practice Standards in conjunction with the proposed NERC TLR Reliability Standards to ensure that all relevant aspects of TLR standards are either included in the NERC proposal or in the NAESB business practices. Please note that the NAESB business practice standards are copyright protected. Should you need to obtain a copy of the NAESB standards for other purposes, please contact the NAESB office.

[2] In the mapping of the NERC/NAESB TLR split, the following key is being used: Yellow — recommended for transfer to a new Attachment 2 in future work on the standard, Gray — agreed as being part of the NAESB Business Practices, Blue — to be deleted as obsolete in future work on the standard.

Note that you do not have to answer all questions.

1. Do you agree that the new "Purpose" statement captures the intent of the standard? If not, please explain your answer.

   The original purpose stated "Regardless of the process it uses, the Reliability Coordinator must direct its Balancing Authorities and Transmission Operators to return the transmission system to within its Interconnection Reliability Operating Limits as soon as possible, but no longer than 30 minutes. The Reliability Coordinator needs to direct Balancing Authorities and Transmission Operators to execute actions such as reconfiguration, redispatch, or load shedding until relief requested by the TLR process is achieved."

   The new purpose states "The purpose of this standard is to provide a method to prevent and or manage congestion on the Bulk Electric System."

   ☒ Yes

   ☐ No

   Comments:

2. In order to develop appropriate measures and compliance elements for the requirements and hold the applicable reliability functions responsible for meeting these requirements, the team has removed Transmission Operator from the applicability list on the basis that the requirements in IRO-006-3 that apply to the Transmission Operators are either not applicable (Section 1.6.3, Attachment 1) or already covered by other standards (Sections 1.8.1 and 2.9.2, Attachment 1). Do you agree with the applicable entities defined in the standard? If not, please specify to which entities the standard should apply.

   ☒ Yes

   ☐ No

   Comments:

3. The intent of the revised standard is to capture the reliability requirements of the former TLR procedure following the NERC/NAESB split. Do you agree that the draft revisions to the standard and Attachment 1 accomplished this objective? If not, please explain your answer.

   ☒ Yes

   ☐ No

   Comments:

4. Do you agree with the violation risk factors proposed in the standard? If not, please explain your answer.

   ☒ Yes

   ☐ No

   Comments:

5. Do you agree with the time horizons proposed in the standard? The drafting team was given the following criteria to use in assigning a "time horizon." Note that time horizons are used as one component in determining the size of a sanction. More information about time horizons can be found in the Sanctions Guidelines.

   - Long-term Planning — a planning horizon of one year or longer.
   - Operations Planning — operating and resource plans from day-ahead up to and including seasonal.
   - Same-day Operations — routine actions required within the timeframe of a day, but not real-time.
   - Real-time Operations — actions required within one hour or less to preserve the reliability of the Bulk Electric System.
   - Operations Assessment — follow-up evaluations and reporting of real time operations.

   If not, please explain your answer.

   ☒ Yes

   ☐ No

   Comments:

6. Do you agree with the measures proposed in the standard? If not, please explain your answer.

   ☒ Yes

   ☐ No

   Comments:

7. Do you agree with the compliance elements proposed in the standard? If not, please explain your answer.

   ☒ Yes

   ☐ No

   Comments:

8. The drafting team is planning a joint NERC NAESB TLR operator's manual for the TLR procedure. What would your organization like to see contained in a joint manual?

   Comments: N/A for Public Service Commission of South Carolina

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

   ☐ Yes

   ☒ No

   Comments:

10. Do you have any concerns that would prevent you from voting to approve this draft standard? If yes, please explain your answer.

    ☐ Yes

    ☒ No

    Comments:

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

    Comments: None

Comment Form — Draft Standard IRO-006-4 — Reliability Coordination — Transmission Loading Relief

Please use this form to submit comments on the first draft of the TLR procedure NERC/NAESB split for the Eastern Interconnection (IRO-006-4 — Reliability Coordination — Transmission Loading Relief – Attachment 1). Comments must be submitted by **June 14, 2007**. You must submit the completed form by e-mail to sarcomm@nerc.net with the words "**NERC / NAESB TLR Split**" in the subject line. If you have questions please contact Andy Rodriquez at andy.rodriquez@nerc.net or 609-947-3885.

Individual Commenter Information (Complete this page for comments from one organization or individual.)		
Name:	Greg Rowland	
Organization:	Duke Energy	
Telephone:	704-382-5348	
E-mail:	gdrowlan@duke-energy.com	
NERC Region		**Registered Ballot Body Segment**
☐ **ERCOT** ☐ **FRCC** ☐ **MRO** ☐ **NPCC** ☒ **RFC** ☒ **SERC** ☐ **SPP** ☐ **WECC** ☐ **NA – Not Applicable**	☒	1 — Transmission Owners
	☐	2 — RTOs and ISOs
	☒	3 — Load-serving Entities
	☐	4 — Transmission-dependent Utilities
	☐	5 — Electric Generators
	☐	6 — Electricity Brokers, Aggregators, and Marketers
	☐	7 — Large Electricity End Users
	☐	8 — Small Electricity End Users
	☐	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, indicate the best fit for the purpose of these comments. Regional acronyms and segment numbers are shown on the prior page.

Background Information

NERC and the North American Energy Standards Board (NAESB) last year finalized a procedure for coordinating the development of standards in areas that affect both reliability and business practices, such as power interchange and congestion management. This approach allows the reliability requirements to be developed through the NERC process and the business practices to be developed through the NAESB process, with the actual development work being done by a joint team sponsored by NERC and NAESB.

Thus the standards will be separate but closely integrated. This approach is more effective than previous efforts that assigned standards to either NERC or NAESB when the subject matter obviously contains both reliability and business practice elements.

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NAESB completed its ratification of its respective TLR business practices[1] on April 10, 2006, with updates for an SPP regional difference and changes to TLR Levels 3b and 4 ratified on September 1, 2006.

Following completion of its SAR process, NERC formed a TLR Drafting Team in August 2006. The NERC TLR Drafting Team has been meeting jointly with the NAESB Wholesale Electric Quadrant (WEQ) Business Practices Subcommittee to complete the respective changes to the NERC TLR standard IRO-006 to document the previously agreed-upon NERC/NAESB split of the TLR requirements. In addition, the team has also developed measures, compliance elements and other standard elements to meet the requirements of the NERC Reliability Standards Development Procedure.

In conducting this work, the team attempted to retain the original IRO-006 requirements to the extent possible to avoid creating new elements that may precipitate lengthy debates hence delaying implementing the NERC/NAESB split. However, where in the judgment of the team the standard requirements as written were deemed to create difficulties in developing the necessary measures and compliance elements, the team modified the requirements to achieve those objectives.

The comment form is asking for comments ONLY on the changes to the draft NERC standard. The sections highlighted[2] in the mapping document for the draft standard are being recommended for retirement from the NERC TLR standard.

As part of the project plan for this effort, the drafting team envisions creating a joint operators' manual that will contain both the NERC and NAESB portions of the TLR procedure.

---

[1] Please access http://naesb.org/misc/fa_weq_r06002_attachment%20_2_.pdf to review the NAESB TLR Business Practice Standards in conjunction with the proposed NERC TLR Reliability Standards to ensure that all relevant aspects of TLR standards are either included in the NERC proposal or in the NAESB business practices. Please note that the NAESB business practice standards are copyright protected. Should you need to obtain a copy of the NAESB standards for other purposes, please contact the NAESB office.

[2] In the mapping of the NERC/NAESB TLR split, the following key is being used: Yellow — recommended for transfer to a new Attachment 2 in future work on the standard, Gray — agreed as being part of the NAESB Business Practices, Blue — to be deleted as obsolete in future work on the standard.

Note that you do not have to answer all questions.

1. Do you agree that the new "Purpose" statement captures the intent of the standard? If not, please explain your answer.

   The original purpose stated "Regardless of the process it uses, the Reliability Coordinator must direct its Balancing Authorities and Transmission Operators to return the transmission system to within its Interconnection Reliability Operating Limits as soon as possible, but no longer than 30 minutes. The Reliability Coordinator needs to direct Balancing Authorities and Transmission Operators to execute actions such as reconfiguration, redispatch, or load shedding until relief requested by the TLR process is achieved."

   The new purpose states "The purpose of this standard is to provide a method to prevent and or manage congestion on the Bulk Electric System."

   ☒ Yes

   ☐ No

   Comments:

2. In order to develop appropriate measures and compliance elements for the requirements and hold the applicable reliability functions responsible for meeting these requirements, the team has removed Transmission Operator from the applicability list on the basis that the requirements in IRO-006-3 that apply to the Transmission Operators are either not applicable (Section 1.6.3, Attachment 1) or already covered by other standards (Sections 1.8.1 and 2.9.2, Attachment 1). Do you agree with the applicable entities defined in the standard? If not, please specify to which entities the standard should apply.

   ☒ Yes

   ☐ No

   Comments:

3. The intent of the revised standard is to capture the reliability requirements of the former TLR procedure following the NERC/NAESB split. Do you agree that the draft revisions to the standard and Attachment 1 accomplished this objective? If not, please explain your answer.

   ☐ Yes

   ☒ No

   Comments: The portions of the Regional Differences (Section E) that describe how the impact of market flows on facilities are calculated should not be moved to NAESB. The amount of flow presented to the IDC for curtailment on a constrained facility (Flowgate) clearly has Reliability aspects.

   Also, while it is clear what the intent is, the objective has not been accomplished because there are some instances where information may need to be in both documents.

   Attachment 1 - Section 2 Transmission Loading Relief (TLR) Levels should have a statement for each level that indicates whether or not transactions will be impacted. (Example – for TLR Level 1 – No transactions will be impacted; Level 2 - Prevents all

transactions less than priority 7 with TDF > 5% from starting or increasing; etc.) A good guide for this can be found on the NERC site under IDC training – IDC TLR Matrix.

Attachment 1 - Section 3.1 (Interchange Transaction Curtailment Order for use in TLR Procedures / Priority of Interchange Transactions) should not be moved to NAESB. Without this, there will be no reference to the curtailment order in the procedure.

Additional comments:

Section 1.5.1 should not move to NAESB

Section 2.2.2 "However, the RC…on the Constrained Facility" should stay in IRO-004.

Section 2.2.3 "If the time in TLR Level 2…TLR Log" should stay in IRO-004.

Section 2.5.3 First sentence should move to NAESB.

Section 2.5.3 Reference to Section 4 in last sentence needs to be reviewed since Section 4 moves to NAESB.

Section 3.2 – 3.2.1.1 Stay in the IRO.

Section 4.1.4 Stay in the IRO.

Section 6 – 6.1 Need wording like section 7 – 7.1

Section 6.2 -6.2.6 Should move to NAESB

Section 7.4.1 – 7.4.3 Move to NAESB

Section 7.7 – 7.9, Appendix E and F should move to NAESB.

• Attachment 1 - Section 1.7 Redispatch options should not be moved

•Attachment 1 - Section 2. - Introduction – The last two sentences are "on path/off path discussion". Similar discussion was moved.

• Attachment 1 - Section 2.5.3 – the first sentence should be moved

4. Do you agree with the violation risk factors proposed in the standard? If not, please explain your answer.

   ☒ Yes

   ☐ No

   Comments:

5. Do you agree with the time horizons proposed in the standard? The drafting team was given the following criteria to use in assigning a "time horizon." Note that time horizons are used as one component in determining the size of a sanction. More information about time horizons can be found in the Sanctions Guidelines.

   - Long-term Planning — a planning horizon of one year or longer.
   - Operations Planning — operating and resource plans from day-ahead up to and including seasonal.
   - Same-day Operations — routine actions required within the timeframe of a day, but not real-time.

- Real-time Operations — actions required within one hour or less to preserve the reliability of the Bulk Electric System.
- Operations Assessment — follow-up evaluations and reporting of real time operations.

If not, please explain your answer.

☒ Yes

☐ No

Comments:

6. Do you agree with the measures proposed in the standard? If not, please explain your answer.

   ☐ Yes

   ☒ No

   Comments: M5 seems to be measuring compliance to other Standards. INT-001 and INT-003 has applicability for the BA and not the RC. And INT-004 has applicability for both the RC and BA. INT-004 has no measure or compliance for the RC.

   There should not be a requirement (R5) or measure (M5) that requires compliance to another standard.

   R3 needs to be split into two requirements, one that focuses on implementing a local procedure simultaneously with the Interconnection-wide procedure and another that states specifically, "Each Reliability Coordinator shall follow the curtailments as directed by the Interconnection-wide procedure." This requirement should have a Medium Violation Risk factor and a real time operations time horizon. This would be similar to R4, but for curtailing transactions that are within an Interconnection.

   - M3 – Need to have clarity on just what is considered a procedure in this case.

7. Do you agree with the compliance elements proposed in the standard? If not, please explain your answer.

   ☐ Yes

   ☒ No

   Comments: Violation Severity Levels 2.4.2 and 2.4.3 should be moved from Severe to High because these violations may not adversely affect the effectiveness of TLR in mitigating the congestion on the constrained facility.

   - Section 2.1.2 – the RC has no compliance obligation

8. The drafting team is planning a joint NERC NAESB TLR operator's manual for the TLR procedure. What would your organization like to see contained in a joint manual?

   Comments: We would like to see at least two things: 1) All the requirements that pertain to TLRs from both the IRO standard and the NAESB business practice in one place, and a concise summary of how and when to call a TLR and how to respond to it (sort of an operator's guide).

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

   ☐ Yes

   ☒ No

   Comments:

10. Do you have any concerns that would prevent you from voting to approve this draft standard? If yes, please explain your answer.

    ☐ Yes

    ☐ No

    Comments:

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

    Comments: We are concerned that there is a lack of clarity between R1, R1.1 and R3 regarding the use of local procedures in response to a SOL or IROL viiolation. R1 states that the RC can select a local procedure at its discretion, and R1.1 recognizes that an Interconnection-wide TLR procedure used alone is an inappropriate and ineffective tool. However R3 states that the RC must have prior approval from the ERO to use a local procedure as a substitute for curtailments directed by the Interconnection-wide procedure. However it is unclear how prior approval can be obtained since the local procedure will be case-specific to the problem that initiates the Interconnection-wide procedure. Further, depending upon the resolution of this issue, M3 will need to be restated.

    Also, in general the standard drafting team needs to carefully review cross-references to assure that the reliability and business practices split is correctly implemented.

    B. Requirements:

    • R1.1. - The statement “inappropriate and ineffective tool” need to be clarified. If the reason is that the IDC does not respond fast enough, then say so (similar to statement in Attachment 1 – 1.2.)

Comment Form — Draft Standard IRO-006-4 — Reliability Coordination — Transmission Loading Relief

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Individual Commenter Information (Complete this page for comments from one organization or individual.)		
Name:	Narinder K. Saini	
Organization:	Entergy Services Inc.	
Telephone:	870-543-5420	
E-mail:	nsaini@entergy.com	
NERC Region		**Registered Ballot Body Segment**
☐ **ERCOT** ☐ **FRCC** ☐ **MRO** ☐ **NPCC** ☐ **RFC** ☒ **SERC** ☐ **SPP** ☐ **WECC** ☐ **NA – Not Applicable**	☒	1 — Transmission Owners
	☐	2 — RTOs and ISOs
	☐	3 — Load-serving Entities
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	☐	8 — Small Electricity End Users
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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*
Ed Davis	**Entergy Services Inc.**	**SERC**	Transmission
Jim Case	**Entergy Services**	**SERC**	Transmission

*If more than one Region or Segment applies, indicate the best fit for the purpose of these comments. Regional acronyms and segment numbers are shown on the prior page.

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[1] Please access http://naesb.org/misc/fa_weq_r06002_attachment%20_2_.pdf to review the NAESB TLR Business Practice Standards in conjunction with the proposed NERC TLR Reliability Standards to ensure that all relevant aspects of TLR standards are either included in the NERC proposal or in the NAESB business practices. Please note that the NAESB business practice standards are copyright protected. Should you need to obtain a copy of the NAESB standards for other purposes, please contact the NAESB office.

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Note that you do not have to answer all questions.

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   The new purpose states "The purpose of this standard is to provide a method to prevent and or manage congestion on the Bulk Electric System."

   ☐ Yes

   ☒ No

   Comments:

   The purpose of this standard is to provide a method, as stated in R1, to prevent or relieve SOL or IROL violations to maintain the reliability of the bulk elelctric system. We suggest the purpose be revised to reflect this concept. It seems NAESB will be providing the buisness practices associate with the relief of congestion.

2. In order to develop appropriate measures and compliance elements for the requirements and hold the applicable reliability functions responsible for meeting these requirements, the team has removed Transmission Operator from the applicability list on the basis that the requirements in IRO-006-3 that apply to the Transmission Operators are either not applicable (Section 1.6.3, Attachment 1) or already covered by other standards (Sections 1.8.1 and 2.9.2, Attachment 1). Do you agree with the applicable entities defined in the standard? If not, please specify to which entities the standard should apply.

   ☐ Yes

   ☒ No

   Comments:

   We see that Attachment 1 contains references to and places requirements on the TOP which are not applicable or already covered by other standards. This amounts to double jeopardy to the TOP. It also is inappropriate to state that the standard does not apply to the TOP (Applicability section), but then place requirements on the TOP in Attachment 1 (Section 1.2.1, 1.8.1, and 2.9.2). We agree with the removal of the TOP from the Applicability section. However, we disagree with keeping the requirements on the TOP in Attachment 1. Please remove all references to the TOP in Attachment 1.

3. The intent of the revised standard is to capture the reliability requirements of the former TLR procedure following the NERC/NAESB split. Do you agree that the draft revisions to

the standard and Attachment 1 accomplished this objective? If not, please explain your answer.

☒ Yes

☐ No

Comments: The draft revisions do address the NERC/NAESB split.

4. Do you agree with the violation risk factors proposed in the standard? If not, please explain your answer.

   ☐ Yes

   ☒ No

   Comments:

   We suggest R1 have a VRF of HIGH as improper violation of this requirement by improper use or not use of procedure to alleviate SOL or IROL violation can have severe impact on reliability.

5. Do you agree with the time horizons proposed in the standard? The drafting team was given the following criteria to use in assigning a "time horizon." Note that time horizons are used as one component in determining the size of a sanction. More information about time horizons can be found in the Sanctions Guidelines.

   - Long-term Planning — a planning horizon of one year or longer.
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   - Operations Assessment — follow-up evaluations and reporting of real time operations.

   If not, please explain your answer.

   ☒ Yes

   ☐ No

   Comments:

6. Do you agree with the measures proposed in the standard? If not, please explain your answer.

   ☒ Yes

   ☐ No

   Comments:

7. Do you agree with the compliance elements proposed in the standard? If not, please explain your answer.

   ☒ Yes

   ☐ No

   Comments:

8. The drafting team is planning a joint NERC NAESB TLR operator's manual for the TLR procedure. What would your organization like to see contained in a joint manual?

   Comments:

   We suggest the manual contain Attachement 1 with the appropriate NAESB requirements (standards) interleaved in the proper locations.

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

   ☐ Yes

   ☒ No

   Comments:

10. Do you have any concerns that would prevent you from voting to approve this draft standard? If yes, please explain your answer.

    ☒ Yes

    ☐ No

    Comments:

    We would like the suggestions contained herein to be included in the draft standard. We may also wish to see other changes made, depending on suggestions by other commenters.

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

    Comments:

    There is a comment added to R1.1 reflecting the FERC Order 693 paragraph 964 regarding the use of tools other than TLR to mitigate an actual IROL. That statement, being in R1.1, seems to apply only to the Eastern Interconnection. Please add that note to the other two Interconnections, or move the note so it applies to all three Interconnections.

    Please better define the "Local" Procedure. Is it developed by the TOP? Is the curtailment of transactions allowed in "Local" Procedures? Is only transmission reconfiguration allowed? Is redispatch of designated network resources allowed in a "Local" Procedure?

We realize that better defining "Local Procedure' may not be related to NERC/NAESB split. However, it is important to not use any "Local Procedure" without proper description and disclosure.

M5 identifies specific INT standards, INT-001, INT-003, and INT-004. We suggest the references to specific INT standards be deleted. Some time in the future those specific standards may be retired and this standard would then need to be revised.

Comment Form — Draft Standard IRO-006-4 — Reliability Coordination — Transmission Loading Relief

Please use this form to submit comments on the first draft of the TLR procedure NERC/NAESB split for the Eastern Interconnection (IRO-006-4 — Reliability Coordination — Transmission Loading Relief – Attachment 1). Comments must be submitted by **June 14, 2007**. You must submit the completed form by e-mail to sarcomm@nerc.net with the words "**NERC / NAESB TLR Split**" in the subject line. If you have questions please contact Andy Rodriquez at andy.rodriquez@nerc.net or 609-947-3885.

Individual Commenter Information (Complete this page for comments from one organization or individual.)		
Name:	Ron Falsetti	
Organization:	IESO	
Telephone:	905-855-6187	
E-mail:	roin.falsetti@ieso.ca	
NERC Region		**Registered Ballot Body Segment**
☐ **ERCOT** ☐ **FRCC** ☐ **MRO** ☒ **NPCC** ☐ **RFC** ☐ **SERC** ☐ **SPP** ☐ **WECC** ☐ **NA – Not Applicable**	☐	1 — Transmission Owners
	☒	2 — RTOs and ISOs
	☐	3 — Load-serving Entities
	☐	4 — Transmission-dependent Utilities
	☐	5 — Electric Generators
	☐	6 — Electricity Brokers, Aggregators, and Marketers
	☐	7 — Large Electricity End Users
	☐	8 — Small Electricity End Users
	☐	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, indicate the best fit for the purpose of these comments. Regional acronyms and segment numbers are shown on the prior page.

Background Information

NERC and the North American Energy Standards Board (NAESB) last year finalized a procedure for coordinating the development of standards in areas that affect both reliability and business practices, such as power interchange and congestion management. This approach allows the reliability requirements to be developed through the NERC process and the business practices to be developed through the NAESB process, with the actual development work being done by a joint team sponsored by NERC and NAESB.

Thus the standards will be separate but closely integrated. This approach is more effective than previous efforts that assigned standards to either NERC or NAESB when the subject matter obviously contains both reliability and business practice elements.

On June 1–2, 2005, following an extensive joint process, the NERC NAESB TLR Subcommittee completed a review of and recommended split of both reliability and business practice requirements of the NERC TLR standard IRO-006.

NAESB completed its ratification of its respective TLR business practices[1] on April 10, 2006, with updates for an SPP regional difference and changes to TLR Levels 3b and 4 ratified on September 1, 2006.

Following completion of its SAR process, NERC formed a TLR Drafting Team in August 2006. The NERC TLR Drafting Team has been meeting jointly with the NAESB Wholesale Electric Quadrant (WEQ) Business Practices Subcommittee to complete the respective changes to the NERC TLR standard IRO-006 to document the previously agreed-upon NERC/NAESB split of the TLR requirements. In addition, the team has also developed measures, compliance elements and other standard elements to meet the requirements of the NERC Reliability Standards Development Procedure.

In conducting this work, the team attempted to retain the original IRO-006 requirements to the extent possible to avoid creating new elements that may precipitate lengthy debates hence delaying implementing the NERC/NAESB split. However, where in the judgment of the team the standard requirements as written were deemed to create difficulties in developing the necessary measures and compliance elements, the team modified the requirements to achieve those objectives.

The comment form is asking for comments ONLY on the changes to the draft NERC standard. The sections highlighted[2] in the mapping document for the draft standard are being recommended for retirement from the NERC TLR standard.

As part of the project plan for this effort, the drafting team envisions creating a joint operators' manual that will contain both the NERC and NAESB portions of the TLR procedure.

---

[1] Please access http://naesb.org/misc/fa_weq_r06002_attachment%20_2_.pdf to review the NAESB TLR Business Practice Standards in conjunction with the proposed NERC TLR Reliability Standards to ensure that all relevant aspects of TLR standards are either included in the NERC proposal or in the NAESB business practices. Please note that the NAESB business practice standards are copyright protected. Should you need to obtain a copy of the NAESB standards for other purposes, please contact the NAESB office.

[2] In the mapping of the NERC/NAESB TLR split, the following key is being used: Yellow — recommended for transfer to a new Attachment 2 in future work on the standard, Gray — agreed as being part of the NAESB Business Practices, Blue — to be deleted as obsolete in future work on the standard.

Note that you do not have to answer all questions.

1. Do you agree that the new "Purpose" statement captures the intent of the standard? If not, please explain your answer.

   The original purpose stated "Regardless of the process it uses, the Reliability Coordinator must direct its Balancing Authorities and Transmission Operators to return the transmission system to within its Interconnection Reliability Operating Limits as soon as possible, but no longer than 30 minutes. The Reliability Coordinator needs to direct Balancing Authorities and Transmission Operators to execute actions such as reconfiguration, redispatch, or load shedding until relief requested by the TLR process is achieved."

   The new purpose states "The purpose of this standard is to provide a method to prevent and or manage congestion on the Bulk Electric System."

   ☒ Yes

   ☐ No

   Comments:

2. In order to develop appropriate measures and compliance elements for the requirements and hold the applicable reliability functions responsible for meeting these requirements, the team has removed Transmission Operator from the applicability list on the basis that the requirements in IRO-006-3 that apply to the Transmission Operators are either not applicable (Section 1.6.3, Attachment 1) or already covered by other standards (Sections 1.8.1 and 2.9.2, Attachment 1). Do you agree with the applicable entities defined in the standard? If not, please specify to which entities the standard should apply.

   ☒ Yes

   ☐ No

   Comments:

3. The intent of the revised standard is to capture the reliability requirements of the former TLR procedure following the NERC/NAESB split. Do you agree that the draft revisions to the standard and Attachment 1 accomplished this objective? If not, please explain your answer.

   ☐ Yes

   ☐ No

   Comments:

4. Do you agree with the violation risk factors proposed in the standard? If not, please explain your answer.

   ☒ Yes

   ☐ No

   Comments:

5. Do you agree with the time horizons proposed in the standard? The drafting team was given the following criteria to use in assigning a "time horizon." Note that time horizons are used as one component in determining the size of a sanction. More information about time horizons can be found in the Sanctions Guidelines.

   - Long-term Planning — a planning horizon of one year or longer.
   - Operations Planning — operating and resource plans from day-ahead up to and including seasonal.
   - Same-day Operations — routine actions required within the timeframe of a day, but not real-time.
   - Real-time Operations — actions required within one hour or less to preserve the reliability of the Bulk Electric System.
   - Operations Assessment — follow-up evaluations and reporting of real time operations.

   If not, please explain your answer.

   ☒ Yes

   ☐ No

   Comments:

6. Do you agree with the measures proposed in the standard? If not, please explain your answer.

   ☒ Yes

   ☐ No

   Comments:

7. Do you agree with the compliance elements proposed in the standard? If not, please explain your answer.

   ☒ Yes

   ☐ No

   Comments:

8. The drafting team is planning a joint NERC NAESB TLR operator's manual for the TLR procedure. What would your organization like to see contained in a joint manual?

   Comments: Following the split of IRO-006, a joint NERC/NAESB TLR operator's manual is required to allow system operator to have a one-stop shop for all the requirements - reliability and business practice, needed to implement an interconnection-wide TLR procedure.

   The TLR operator's manual, therefore, should contain all the information in the pre-split IRO-006, and be made available to all operating entities through NERC.

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

   ☐ Yes

   ☒ No

   Comments:

10. Do you have any concerns that would prevent you from voting to approve this draft standard? If yes, please explain your answer.

    ☐ Yes

    ☒ No

    Comments:

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

    Comments: None

Comment Form — Draft Standard IRO-006-4 — Reliability Coordination — Transmission Loading Relief

Please use this form to submit comments on the first draft of the TLR procedure NERC/NAESB split for the Eastern Interconnection (IRO-006-4 — Reliability Coordination — Transmission Loading Relief – Attachment 1). Comments must be submitted by **June 14, 2007**. You must submit the completed form by e-mail to sarcomm@nerc.net with the words "**NERC / NAESB TLR Split**" in the subject line. If you have questions please contact Andy Rodriquez at andy.rodriquez@nerc.net or 609-947-3885.

Individual Commenter Information (Complete this page for comments from one organization or individual.)		
Name:		
Organization:		
Telephone:		
E-mail:		
NERC Region		**Registered Ballot Body Segment**
☐ **ERCOT** ☐ **FRCC** ☐ **MRO** ☐ **NPCC** ☐ **RFC** ☐ **SERC** ☐ **SPP** ☐ **WECC** ☐ **NA – Not Applicable**	☐	1 — Transmission Owners
	☐	2 — RTOs and ISOs
	☐	3 — Load-serving Entities
	☐	4 — Transmission-dependent Utilities
	☐	5 — Electric Generators
	☐	6 — Electricity Brokers, Aggregators, and Marketers
	☐	7 — Large Electricity End Users
	☐	8 — Small Electricity End Users
	☐	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: NSRS

Lead Contact: **Robert Coish**

Contact Organization: **MRO**

Contact Segment: **10**

Contact Telephone: **204-487-5479**

Contact E-mail: **rgcoish@hydro.mb.ca**

Additional Member Name	Additional Member Organization	Region*	Segment*
Joe Knight	Great River Energy	MRO	10
Terry Bilke	MISO	MRO	10
Mike Brytowski	Midwest Reliability Organizatio	MRO	10
David Rudolph	Basin Electric Power Cooperative	MRO	10
Pamela Oreschrick	Xcel Energy	MRO	10
Neal Balu	WPSR	MRO	10
Carol Gerou	Minnesota Power	MRO	10
Jim Haigh	WAPA	MRO	10

*If more than one Region or Segment applies, indicate the best fit for the purpose of these comments. Regional acronyms and segment numbers are shown on the prior page.

Background Information

NERC and the North American Energy Standards Board (NAESB) last year finalized a procedure for coordinating the development of standards in areas that affect both reliability and business practices, such as power interchange and congestion management. This approach allows the reliability requirements to be developed through the NERC process and the business practices to be developed through the NAESB process, with the actual development work being done by a joint team sponsored by NERC and NAESB.

Thus the standards will be separate but closely integrated. This approach is more effective than previous efforts that assigned standards to either NERC or NAESB when the subject matter obviously contains both reliability and business practice elements.

On June 1–2, 2005, following an extensive joint process, the NERC NAESB TLR Subcommittee completed a review of and recommended split of both reliability and business practice requirements of the NERC TLR standard IRO-006.

NAESB completed its ratification of its respective TLR business practices[1] on April 10, 2006, with updates for an SPP regional difference and changes to TLR Levels 3b and 4 ratified on September 1, 2006.

Following completion of its SAR process, NERC formed a TLR Drafting Team in August 2006. The NERC TLR Drafting Team has been meeting jointly with the NAESB Wholesale Electric Quadrant (WEQ) Business Practices Subcommittee to complete the respective changes to the NERC TLR standard IRO-006 to document the previously agreed-upon NERC/NAESB split of the TLR requirements. In addition, the team has also developed measures, compliance elements and other standard elements to meet the requirements of the NERC Reliability Standards Development Procedure.

In conducting this work, the team attempted to retain the original IRO-006 requirements to the extent possible to avoid creating new elements that may precipitate lengthy debates hence delaying implementing the NERC/NAESB split. However, where in the judgment of the team the standard requirements as written were deemed to create difficulties in developing the necessary measures and compliance elements, the team modified the requirements to achieve those objectives.

The comment form is asking for comments ONLY on the changes to the draft NERC standard. The sections highlighted[2] in the mapping document for the draft standard are being recommended for retirement from the NERC TLR standard.

As part of the project plan for this effort, the drafting team envisions creating a joint operators' manual that will contain both the NERC and NAESB portions of the TLR procedure.

---

[1] Please access http://naesb.org/misc/fa_weq_r06002_attachment%20_2_.pdf to review the NAESB TLR Business Practice Standards in conjunction with the proposed NERC TLR Reliability Standards to ensure that all relevant aspects of TLR standards are either included in the NERC proposal or in the NAESB business practices. Please note that the NAESB business practice standards are copyright protected. Should you need to obtain a copy of the NAESB standards for other purposes, please contact the NAESB office.

[2] In the mapping of the NERC/NAESB TLR split, the following key is being used: Yellow — recommended for transfer to a new Attachment 2 in future work on the standard, Gray — agreed as being part of the NAESB Business Practices, Blue — to be deleted as obsolete in future work on the standard.

Note that you do not have to answer all questions.

1. Do you agree that the new "Purpose" statement captures the intent of the standard? If not, please explain your answer.

   The original purpose stated "Regardless of the process it uses, the Reliability Coordinator must direct its Balancing Authorities and Transmission Operators to return the transmission system to within its Interconnection Reliability Operating Limits as soon as possible, but no longer than 30 minutes. The Reliability Coordinator needs to direct Balancing Authorities and Transmission Operators to execute actions such as reconfiguration, redispatch, or load shedding until relief requested by the TLR process is achieved."

   The new purpose states "The purpose of this standard is to provide a method to prevent and or manage congestion on the Bulk Electric System."

   ☒ Yes

   ☐ No

   Comments:

2. In order to develop appropriate measures and compliance elements for the requirements and hold the applicable reliability functions responsible for meeting these requirements, the team has removed Transmission Operator from the applicability list on the basis that the requirements in IRO-006-3 that apply to the Transmission Operators are either not applicable (Section 1.6.3, Attachment 1) or already covered by other standards (Sections 1.8.1 and 2.9.2, Attachment 1). Do you agree with the applicable entities defined in the standard? If not, please specify to which entities the standard should apply.

   ☒ Yes

   ☐ No

   Comments:

3. The intent of the revised standard is to capture the reliability requirements of the former TLR procedure following the NERC/NAESB split. Do you agree that the draft revisions to the standard and Attachment 1 accomplished this objective? If not, please explain your answer.

   ☒ Yes

   ☐ No

   Comments:

4. Do you agree with the violation risk factors proposed in the standard? If not, please explain your answer.

   ☐ Yes

   ☒ No

Comments: The Violation Risk Factors are not in line with impact on reliability of the requirements. The VRFs should be higher.

5. Do you agree with the time horizons proposed in the standard? The drafting team was given the following criteria to use in assigning a "time horizon." Note that time horizons are used as one component in determining the size of a sanction. More information about time horizons can be found in the Sanctions Guidelines.

   - Long-term Planning — a planning horizon of one year or longer.
   - Operations Planning — operating and resource plans from day-ahead up to and including seasonal.
   - Same-day Operations — routine actions required within the timeframe of a day, but not real-time.
   - Real-time Operations — actions required within one hour or less to preserve the reliability of the Bulk Electric System.
   - Operations Assessment — follow-up evaluations and reporting of real time operations.

   If not, please explain your answer.

   ☒ Yes

   ☐ No

   Comments:

6. Do you agree with the measures proposed in the standard? If not, please explain your answer.

   ☒ Yes

   ☐ No

   Comments:

7. Do you agree with the compliance elements proposed in the standard? If not, please explain your answer.

   ☒ Yes

   ☐ No

   Comments:

8. The drafting team is planning a joint NERC NAESB TLR operator's manual for the TLR procedure. What would your organization like to see contained in a joint manual?

   Comments: Business practice proceedures and NERC Reliability Standards.

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

   ☐ Yes

☐ No

Comments:

10. Do you have any concerns that would prevent you from voting to approve this draft standard? If yes, please explain your answer.

☐ Yes

☐ No

Comments:

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

Comments: Complete and approve the Joint NERC/NASB operators manual in a expiditiuous manner.

Regarding Requirement R1.1: The requirement needs to be rewritten somehow. It doesn't seem appropriate to me to to list TLR as the first procedure and then go on to say it is an inappropriate procedure and list other more appropriate procedures. The drafting team should just change the list of procedures if they want to specify them and list TLR as the last procedure in the list if that is what they are saying. One MRO member submitted the following comment regarding violation severity levels: I question whether 2.4.2, 2.4.3 or 2.4.4 should be severe violations. How any of these actually could lead to system separation or collapse in and of themselves is not obvious to me. In addition I question the whole premise of how they are using this set of violation severity levels. They are all premised on a violation during one IROL incident. It seems to me that a violation of one step in a procedure to mitigate an IROL should not be what is considered, but a pattern of not following procedures or mitigation steps or IROL's not being mitigated in the 30 minutes allowed. Making one simple mistake in implementing a procedure in one IROL incident should not lead to sanctions.

Comment Form — Draft Standard IRO-006-4 — Reliability Coordination — Transmission Loading Relief

Please use this form to submit comments on the first draft of the TLR procedure NERC/NAESB split for the Eastern Interconnection (IRO-006-4 — Reliability Coordination — Transmission Loading Relief – Attachment 1). Comments must be submitted by **June 14, 2007**. You must submit the completed form by e-mail to sarcomm@nerc.net with the words "**NERC / NAESB TLR Split**" in the subject line. If you have questions please contact Andy Rodriquez at andy.rodriquez@nerc.net or 609-947-3885.

Individual Commenter Information (Complete this page for comments from one organization or individual.)		
Name:		
Organization:		
Telephone:		
E-mail:		
NERC Region		**Registered Ballot Body Segment**
☐ **ERCOT** ☐ **FRCC** ☐ **MRO** ☐ **NPCC** ☐ **RFC** ☒ **SERC** ☐ **SPP** ☐ **WECC** ☐ **NA – Not Applicable**	☒	1 — Transmission Owners
	☐	2 — RTOs and ISOs
	☒	3 — Load-serving Entities
	☐	4 — Transmission-dependent Utilities
	☐	5 — Electric Generators
	☐	6 — Electricity Brokers, Aggregators, and Marketers
	☐	7 — Large Electricity End Users
	☐	8 — Small Electricity End Users
	☐	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: Southern Company -- Transmission

Lead Contact: **Marc Butts**

Contact Organization: **Southern Company Services, Inc.**

Contact Segment: **1**

Contact Telephone: **205-257-4839**

Contact E-mail: **mmbutts@southernco.com**

Additional Member Name	Additional Member Organization	Region*	Segment*
J. T. Wood	**Southern Company Services, Inc.**	**SERC**	1
Roman Carter	**Southern Company Services, Inc.**	**SERC**	1

*If more than one Region or Segment applies, indicate the best fit for the purpose of these comments. Regional acronyms and segment numbers are shown on the prior page.

Background Information

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---

[1] Please access http://naesb.org/misc/fa_weq_r06002_attachment%20_2_.pdf to review the NAESB TLR Business Practice Standards in conjunction with the proposed NERC TLR Reliability Standards to ensure that all relevant aspects of TLR standards are either included in the NERC proposal or in the NAESB business practices. Please note that the NAESB business practice standards are copyright protected. Should you need to obtain a copy of the NAESB standards for other purposes, please contact the NAESB office.

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Note that you do not have to answer all questions.

1. Do you agree that the new "Purpose" statement captures the intent of the standard? If not, please explain your answer.

   The original purpose stated "Regardless of the process it uses, the Reliability Coordinator must direct its Balancing Authorities and Transmission Operators to return the transmission system to within its Interconnection Reliability Operating Limits as soon as possible, but no longer than 30 minutes. The Reliability Coordinator needs to direct Balancing Authorities and Transmission Operators to execute actions such as reconfiguration, redispatch, or load shedding until relief requested by the TLR process is achieved."

   The new purpose states "The purpose of this standard is to provide a method to prevent and or manage congestion on the Bulk Electric System."

   ☒ Yes

   ☐ No

   Comments: The original purpose contained phrasing that sounded more like requirements - terms such as "... the Reliability Coordiantor Must ..." and "... the Rliability Coordiantor needs to ..." - than a clear, concise purpose for the standard. We feel the newly stated purpose accomplishes this.

2. In order to develop appropriate measures and compliance elements for the requirements and hold the applicable reliability functions responsible for meeting these requirements, the team has removed Transmission Operator from the applicability list on the basis that the requirements in IRO-006-3 that apply to the Transmission Operators are either not applicable (Section 1.6.3, Attachment 1) or already covered by other standards (Sections 1.8.1 and 2.9.2, Attachment 1). Do you agree with the applicable entities defined in the standard? If not, please specify to which entities the standard should apply.

   ☒ Yes

   ☐ No

   Comments: We agree.

3. The intent of the revised standard is to capture the reliability requirements of the former TLR procedure following the NERC/NAESB split. Do you agree that the draft revisions to the standard and Attachment 1 accomplished this objective? If not, please explain your answer.

   ☒ Yes

   ☐ No

   Comments: We agree the standard and its attachment seem to reflect all reliability components of the pre-split standard.

4. Do you agree with the violation risk factors proposed in the standard? If not, please explain your answer.

   ☒ Yes

   ☐ No

   Comments: We find the proposed violation risk factors appropriate.

5. Do you agree with the time horizons proposed in the standard? The drafting team was given the following criteria to use in assigning a "time horizon." Note that time horizons are used as one component in determining the size of a sanction. More information about time horizons can be found in the Sanctions Guidelines.

   - Long-term Planning — a planning horizon of one year or longer.
   - Operations Planning — operating and resource plans from day-ahead up to and including seasonal.
   - Same-day Operations — routine actions required within the timeframe of a day, but not real-time.
   - Real-time Operations — actions required within one hour or less to preserve the reliability of the Bulk Electric System.
   - Operations Assessment — follow-up evaluations and reporting of real time operations.

   If not, please explain your answer.

   ☒ Yes

   ☐ No

   Comments: We are in agreement with the proposed time horizons for this standard.

6. Do you agree with the measures proposed in the standard? If not, please explain your answer.

   ☒ Yes

   ☐ No

   Comments: We agree with the proposed measures for this standard.

7. Do you agree with the compliance elements proposed in the standard? If not, please explain your answer.

   ☒ Yes

   ☐ No

   Comments: We agree with the proposed compliance elements reflected in this standard.

8. The drafting team is planning a joint NERC NAESB TLR operator's manual for the TLR procedure. What would your organization like to see contained in a joint manual?

   Comments: The joint NERC NAESB TLR Operator's Manual should essentially provide the operator with the same information he/she has in the pre-split version of the standard. The drafting team should work to format the joint manual in a way that follows a logical order and is easily understandable The manual should contain references to the latest version of the applicable NERC Standards and NAESB Business Practices. A question for the Drafting Team i- how will the joint manual be maintained and updated?

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

   ☐ Yes

   ☒ No

   Comments:

10. Do you have any concerns that would prevent you from voting to approve this draft standard? If yes, please explain your answer.

    ☐ Yes

    ☒ No

    Comments:

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

    Comments: We have no further comment at this time. We appreciate the work of the TLR Drafting Team and our opportunity to submit comments regarding the proposed standard.

Comment Form — Draft Standard IRO-006-4 — Reliability Coordination — Transmission Loading Relief

Please use this form to submit comments on the first draft of the TLR procedure NERC/NAESB split for the Eastern Interconnection (IRO-006-4 — Reliability Coordination — Transmission Loading Relief – Attachment 1). Comments must be submitted by **June 14, 2007**. You must submit the completed form by e-mail to sarcomm@nerc.net with the words "**NERC / NAESB TLR Split**" in the subject line. If you have questions please contact Andy Rodriquez at andy.rodriquez@nerc.net or 609-947-3885.

Individual Commenter Information (Complete this page for comments from one organization or individual.)		
Name:		
Organization: Tennessee Valley Authority		
Telephone:		
E-mail:		
NERC Region		**Registered Ballot Body Segment**
☐ **ERCOT** ☐ **FRCC** ☐ **MRO** ☐ **NPCC** ☐ **RFC** ☒ **SERC** ☐ **SPP** ☐ **WECC** ☐ **NA – Not Applicable**	☐	1 — Transmission Owners
	☐	2 — RTOs and ISOs
	☐	3 — Load-serving Entities
	☐	4 — Transmission-dependent Utilities
	☐	5 — Electric Generators
	☐	6 — Electricity Brokers, Aggregators, and Marketers
	☐	7 — Large Electricity End Users
	☐	8 — Small Electricity End Users
	☐	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: Tennessee Valley Authority Reliability Coordinators

Lead Contact: **Sue Mangum-Goins**

Contact Organization: **TVA**

Contact Segment:

Contact Telephone: **423-697-2930**

Contact E-mail: **csmangum@tva.gov**

Additional Member Name	Additional Member Organization	Region*	Segment*
Stuart Goza	**TVA Reliability Coordinators**	**SERC**	

*If more than one Region or Segment applies, indicate the best fit for the purpose of these comments. Regional acronyms and segment numbers are shown on the prior page.

Background Information

NERC and the North American Energy Standards Board (NAESB) last year finalized a procedure for coordinating the development of standards in areas that affect both reliability and business practices, such as power interchange and congestion management. This approach allows the reliability requirements to be developed through the NERC process and the business practices to be developed through the NAESB process, with the actual development work being done by a joint team sponsored by NERC and NAESB.

Thus the standards will be separate but closely integrated. This approach is more effective than previous efforts that assigned standards to either NERC or NAESB when the subject matter obviously contains both reliability and business practice elements.

On June 1–2, 2005, following an extensive joint process, the NERC NAESB TLR Subcommittee completed a review of and recommended split of both reliability and business practice requirements of the NERC TLR standard IRO-006.

NAESB completed its ratification of its respective TLR business practices[1] on April 10, 2006, with updates for an SPP regional difference and changes to TLR Levels 3b and 4 ratified on September 1, 2006.

Following completion of its SAR process, NERC formed a TLR Drafting Team in August 2006. The NERC TLR Drafting Team has been meeting jointly with the NAESB Wholesale Electric Quadrant (WEQ) Business Practices Subcommittee to complete the respective changes to the NERC TLR standard IRO-006 to document the previously agreed-upon NERC/NAESB split of the TLR requirements. In addition, the team has also developed measures, compliance elements and other standard elements to meet the requirements of the NERC Reliability Standards Development Procedure.

In conducting this work, the team attempted to retain the original IRO-006 requirements to the extent possible to avoid creating new elements that may precipitate lengthy debates hence delaying implementing the NERC/NAESB split. However, where in the judgment of the team the standard requirements as written were deemed to create difficulties in developing the necessary measures and compliance elements, the team modified the requirements to achieve those objectives.

The comment form is asking for comments ONLY on the changes to the draft NERC standard. The sections highlighted[2] in the mapping document for the draft standard are being recommended for retirement from the NERC TLR standard.

As part of the project plan for this effort, the drafting team envisions creating a joint operators' manual that will contain both the NERC and NAESB portions of the TLR procedure.

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[1] Please access http://naesb.org/misc/fa_weq_r06002_attachment%20_2_.pdf to review the NAESB TLR Business Practice Standards in conjunction with the proposed NERC TLR Reliability Standards to ensure that all relevant aspects of TLR standards are either included in the NERC proposal or in the NAESB business practices. Please note that the NAESB business practice standards are copyright protected. Should you need to obtain a copy of the NAESB standards for other purposes, please contact the NAESB office.

[2] In the mapping of the NERC/NAESB TLR split, the following key is being used: Yellow — recommended for transfer to a new Attachment 2 in future work on the standard, Gray — agreed as being part of the NAESB Business Practices, Blue — to be deleted as obsolete in future work on the standard.

Note that you do not have to answer all questions.

1. Do you agree that the new "Purpose" statement captures the intent of the standard? If not, please explain your answer.

   The original purpose stated "Regardless of the process it uses, the Reliability Coordinator must direct its Balancing Authorities and Transmission Operators to return the transmission system to within its Interconnection Reliability Operating Limits as soon as possible, but no longer than 30 minutes. The Reliability Coordinator needs to direct Balancing Authorities and Transmission Operators to execute actions such as reconfiguration, redispatch, or load shedding until relief requested by the TLR process is achieved."

   The new purpose states "The purpose of this standard is to provide a method to prevent and or manage congestion on the Bulk Electric System."

   ☒ Yes

   ☐ No

   Comments:

2. In order to develop appropriate measures and compliance elements for the requirements and hold the applicable reliability functions responsible for meeting these requirements, the team has removed Transmission Operator from the applicability list on the basis that the requirements in IRO-006-3 that apply to the Transmission Operators are either not applicable (Section 1.6.3, Attachment 1) or already covered by other standards (Sections 1.8.1 and 2.9.2, Attachment 1). Do you agree with the applicable entities defined in the standard? If not, please specify to which entities the standard should apply.

   ☐ Yes

   ☒ No

   Comments: In R1 of the standard it states that the Reliabiilty Coordintor shall, "with its authority and at its discretion, select" one or more procedures to provide transmission loading relief. In Sections 1.1 and 1.2.1 of Attachment 1 to IRO-006 it states that the RC shall initiate a TLR at the request of the Transmission Operator (Section 1.1 Attachment 1) or if any Transmission Operator who operates a tie facility shall be allowed to request relief from its Reliability Coordinator (Section 1.2.1). Since requirement R1.1 states that the TLR procedure for use in the Eastern Interconnection is provided in Attachment 1 then we feel the Transmission Operator requesting their RC to implement the TLR procedure should be held accountable for requesting to use the procedure and therefore it should be applicable to the TOp.

3. The intent of the revised standard is to capture the reliability requirements of the former TLR procedure following the NERC/NAESB split. Do you agree that the draft revisions to the standard and Attachment 1 accomplished this objective? If not, please explain your answer.

   ☒ Yes

   ☐ No

Comments: Agree if this is viewed against the current posted version 3 of IRO_006 but not against Version 0 of IRO-006.

4. Do you agree with the violation risk factors proposed in the standard? If not, please explain your answer.

   ☒ Yes

   ☐ No

   Comments:

5. Do you agree with the time horizons proposed in the standard? The drafting team was given the following criteria to use in assigning a "time horizon." Note that time horizons are used as one component in determining the size of a sanction. More information about time horizons can be found in the Sanctions Guidelines.

   - Long-term Planning — a planning horizon of one year or longer.
   - Operations Planning — operating and resource plans from day-ahead up to and including seasonal.
   - Same-day Operations — routine actions required within the timeframe of a day, but not real-time.
   - Real-time Operations — actions required within one hour or less to preserve the reliability of the Bulk Electric System.
   - Operations Assessment — follow-up evaluations and reporting of real time operations.

   If not, please explain your answer.

   ☒ Yes

   ☐ No

   Comments:

6. Do you agree with the measures proposed in the standard? If not, please explain your answer.

   ☒ Yes

   ☐ No

   Comments:

7. Do you agree with the compliance elements proposed in the standard? If not, please explain your answer.

   ☒ Yes

   ☐ No

   Comments: Needs more clarification to understand exact parameters

8. The drafting team is planning a joint NERC NAESB TLR operator's manual for the TLR procedure. What would your organization like to see contained in a joint manual?

   Comments: We would like to see one document that contains both the NERC requirements and NAESB Business Practices together. Would prefer this to be highlighted or different fonts for each so that it is easily distinguishable what sections belong to what group.

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

   ☐ Yes

   ☒ No

   Comments:

10. Do you have any concerns that would prevent you from voting to approve this draft standard? If yes, please explain your answer.

    ☒ Yes

    ☐ No

    Comments: We would like to see the conflict between Requirement 1 and Sections 1.1 and 1.2.1 of Attachment 1 resolved before we could approve this draft. (see question 2)

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

    Comments: None

Comment Form — Draft Standard IRO-006-4 — Reliability Coordination — Transmission Loading Relief

Please use this form to submit comments on the first draft of the TLR procedure NERC/NAESB split for the Eastern Interconnection (IRO-006-4 — Reliability Coordination — Transmission Loading Relief – Attachment 1). Comments must be submitted by **June 14, 2007**. You must submit the completed form by e-mail to sarcomm@nerc.net with the words "**NERC / NAESB TLR Split**" in the subject line. If you have questions please contact Andy Rodriquez at andy.rodriquez@nerc.net or 609-947-3885.

Individual Commenter Information (Complete this page for comments from one organization or individual.)		
Name:		
Organization:		
Telephone:		
E-mail:		
NERC Region		**Registered Ballot Body Segment**
☐ **ERCOT** ☐ **FRCC** ☐ **MRO** ☐ **NPCC** ☐ **RFC** ☐ **SERC** ☐ **SPP** ☐ **WECC** ☐ **NA – Not Applicable**	☐	1 — Transmission Owners
	☒	2 — RTOs and ISOs
	☐	3 — Load-serving Entities
	☐	4 — Transmission-dependent Utilities
	☐	5 — Electric Generators
	☐	6 — Electricity Brokers, Aggregators, and Marketers
	☐	7 — Large Electricity End Users
	☐	8 — Small Electricity End Users
	☐	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: ISO/RTO Council Standards Review Committee (SRC)

Lead Contact: **Charles Yeung**

Contact Organization: **SPP**

Contact Segment: **ISO/RTO**

Contact Telephone: **832-724-6142**

Contact E-mail: **cyeung@SPP.ORG**

Additional Member Name	Additional Member Organization	Region*	Segment*
Jim Castle	**NYISO**	**NPCC**	2
Alicia Daugherty	**PJM**	**RFC**	2
Ron Falsetti	**IESO**	**NPCC**	2
Matt Goldberg	**ISO-NE**	**NPCC**	2
Brent Kingsford	**CAISO**	**WECC**	2
Steve Myers	**ERCOT**	**ERCT**	2
Anita Lee	**AESO**	**WECC**	2
Bill Phillips	**MISO**	**RFC+**	2
		MRO+	
		SERC	

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Background Information

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As part of the project plan for this effort, the drafting team envisions creating a joint operators' manual that will contain both the NERC and NAESB portions of the TLR procedure.

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Note that you do not have to answer all questions.

1. Do you agree that the new "Purpose" statement captures the intent of the standard? If not, please explain your answer.

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   The new purpose states "The purpose of this standard is to provide a method to prevent and or manage congestion on the Bulk Electric System."

   ☒ Yes

   ☐ No

   Comments:

2. In order to develop appropriate measures and compliance elements for the requirements and hold the applicable reliability functions responsible for meeting these requirements, the team has removed Transmission Operator from the applicability list on the basis that the requirements in IRO-006-3 that apply to the Transmission Operators are either not applicable (Section 1.6.3, Attachment 1) or already covered by other standards (Sections 1.8.1 and 2.9.2, Attachment 1). Do you agree with the applicable entities defined in the standard? If not, please specify to which entities the standard should apply.

   ☒ Yes

   ☐ No

   Comments:

3. The intent of the revised standard is to capture the reliability requirements of the former TLR procedure following the NERC/NAESB split. Do you agree that the draft revisions to the standard and Attachment 1 accomplished this objective? If not, please explain your answer.

   ☒ Yes

   ☐ No

   Comments:

4. Do you agree with the violation risk factors proposed in the standard? If not, please explain your answer.

   ☒ Yes

   ☐ No

   Comments:

5. Do you agree with the time horizons proposed in the standard? The drafting team was given the following criteria to use in assigning a "time horizon." Note that time horizons are used as one component in determining the size of a sanction. More information about time horizons can be found in the Sanctions Guidelines.

   - Long-term Planning — a planning horizon of one year or longer.
   - Operations Planning — operating and resource plans from day-ahead up to and including seasonal.
   - Same-day Operations — routine actions required within the timeframe of a day, but not real-time.
   - Real-time Operations — actions required within one hour or less to preserve the reliability of the Bulk Electric System.
   - Operations Assessment — follow-up evaluations and reporting of real time operations.

   If not, please explain your answer.

   ☒ Yes

   ☐ No

   Comments:

6. Do you agree with the measures proposed in the standard? If not, please explain your answer.

   ☒ Yes

   ☐ No

   Comments:

7. Do you agree with the compliance elements proposed in the standard? If not, please explain your answer.

   ☐ Yes

   ☒ No

   Comments: One compliance element issue is that it is not clear how to interpret the number of interconnection wide violations by an RC for each TLR in the Eastern Interconnection (the Violation Severity Level is set by the number of violations). One way to interpret this is that for each TLR event, an RC may have multiple violations. The number of violations for that event establishes the Violation Severity Level for just that event. In this interpretation, the number of violations do not carry over from one event to another event. Another way to interpret this is the RC accumulates the number of violations for all events as it goes through the month until it reaches a total of 6 at which time it has a severe Violation Severity Level. It then resets for the same month such that future TLR violations could result in one or more violations. It is not clear which interpretation to apply. Another compliance element issue is that there is no distinction in the consequences of the violations. This means a minor infraction of one requirement that has no impact on reliability will be treated on an equal basis as a major infraction of another requirement that does have an impact on reliability when determining the violation count to establish the Violation Severity Level.

8. The drafting team is planning a joint NERC NAESB TLR operator's manual for the TLR procedure. What would your organization like to see contained in a joint manual?

   Comments: We agree. This is in line with the correct steps to accomplish what FERC requested of NERC and NAESB. A common manual is the correct way to go on this. The split should be an administrative measure only, so that it is handled as quickly as possible. This would allow the members to quickly start the next phase, which is to do away with the Urgent Action SPP waiver and to change the threshold.

   The combined procedure (NERC-NAESB) should be made available to all areas through NERC. We expect that NERC and NAESB will work out a process where NAESB is OK with their standard being included in the NERC version. The joint NERC-NAESB process allows for this, so the end result needs to be a jointly published document.
   Also, the NERC-NAESB fees need to include some sort of funding for updates to the NERC IDC. A common document will facilitate coordination between functional entities using one guiding procedure."

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

   ☐ Yes

   ☒ No

   Comments:

10. Do you have any concerns that would prevent you from voting to approve this draft standard? If yes, please explain your answer.

    ☒ Yes

    ☐ No

    Comments: See response to Question 7. This could possibly affect vote decisions.

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

    Comments: We find IRO-006-4 a significant improvement over IRO-006-3, however we strongly support continued improvement of this standard. The following comments are intended for Phase III of the standard development.

    IRO-006-4: The roles of the RC (as initiator or responder) are unclear and should be clarified.

    IRO-006-4, Attachment 1: Should be reviewed to determine whether there is any portion that should become part of a standard. Attachment 1 largely is procedural in nature, but part(s) of it possibly should rewritten in the form of a standard.

    IRO-006-4, Attachment 1: Some of the assumptions made by IDC are fairly crude and can result in the inappropriate selection of interchange transactions to be curtailed.

IRO-006-4, Attachment 1: Should either specify requirements for IDC, or require after-the-fact analysis of IDC results upon request to identify and quantify deficiencies, or both.