

Consideration of Comments

Project 2015-06 Interconnection Reliability Operations and Coordination - IRO-006-East and IRO-009

The Project 2015-06 Drafting Team thanks all commenters who submitted comments on the standard. The standard was posted for a 30-day public comment period from March 16, 2015 through April 15, 2015. Stakeholders were asked to provide feedback on the standards and associated documents through a special electronic comment form.

All comments submitted may be reviewed in their original format on the standard's [project page](#).

This document contains the Project 2015-06 Interconnection Reliability Operations (IRO) standard drafting team's (SDT) response to all industry comments received during this comment period. The IRO SDT encourages commenters to review its responses to ensure all concerns have been addressed. The IRO SDT notes that while commenters agree with the IRO SDT's recommendations on the standards, specific concerns were expressed. Some comments supporting the IRO SDT's recommendations are discussed below but in most cases are not specifically addressed in this response. Also, several comments in response to specific questions are duplicated in other questions, and several commenters raise substantively the same concerns as others. Therefore, the IRO SDT's consideration of all comments is addressed in this section in summary form, with duplicate comments treated as a single issue.

If you feel that the substance of your comment has been overlooked, please let us know immediately. Our goal is to give every comment serious consideration in this process. If you feel there has been an error or omission, you can contact the Senior Director of Standards, [Howard Gugel](#) (via email) or at (404) 446-2566.

1. Summary Consideration

Based on the results from the comment and ballot period, it appears that industry generally agrees with the Project 2012-09 IRO Five-Year Review Team (FYRT) recommendations on revisions to IRO-006-EAST-1 and IRO-009-1. However, there are some disagreements among stakeholders and suggestions for language revisions contained in industry comments. To the extent that there are comments beyond the scope of this SDT, those comments will be communicated as appropriate for consideration.

The IRO SDT has carefully reviewed and considered the FYRT recommendations, as well as each stakeholder comment, and has revised the standards where suggested changes improve clarity and are consistent with IRO SDT intent and apparent industry consensus. The IRO SDT has carefully considered standard language as well as explanatory language and has implemented revisions to the FYRT recommendations to further clarify the language based on comments received.

The IRO SDT's consideration of all comments follows.

2. IRO-006-EAST

Several commenters suggested retaining Requirement R1 since it was developed to address a directive.

FERC Order 693, paragraph 964 states:

964. Accordingly, in addition to approving the Reliability Standard, the Commission directs the ERO to develop a modification to IRO-006-3 through the Reliability Standards development process that (1) includes a clear warning that the TLR procedure is an inappropriate and ineffective tool to mitigate actual IROL violations and (2) identifies in a Requirement the available alternatives to mitigate an IROL violation other than use of the TLR procedure. In developing the required modification, the ERO should consider the suggestions of MidAmerican and Xcel.

The IRO SDT agrees with the IRO FYRT's acknowledgment that Requirement R1 addresses the directive. The FYRT notes that IRO-008-1 and IRO-009-1 were developed after Order 693 was issued and the particular directive was addressed. The IRO SDT agrees with the FYRT's assertion that IRO-008-1, Requirement R3 and IRO-009-1, Requirement R4 are redundant with Requirement R1 and that the requirements in IRO-008-1 and IRO-009-1 are results based and specify a reliability objective to be achieved. The IRO SDT further agrees with the FYRT's conclusion that Requirement R1 in IRO-006-EAST-1 simply provides a list of actions to be taken without any parameters for their use. The requirements of IRO-008-1 and IRO-009-1 point to IROL exceedances and mitigating the magnitude and duration within the IROL's Tv.

IRO-008-1, R3: When a Reliability Coordinator determines that the results of an Operational Planning Analysis or Real-time Assessment indicates the need for specific operational actions to prevent or mitigate an instance of exceeding an IROL, the Reliability Coordinator shall share its results with those entities that are expected to take those actions.

IRO-009-1, R4: When actual system conditions show that there is an instance of exceeding an IROL in its Reliability Coordinator Area, the Reliability Coordinator shall, without delay, act or direct others to act to mitigate the magnitude and duration of the instance of exceeding that IROL within the IROL's Tv.

It should be noted that there is potential overlap between these two requirements in the instance where there is an IROL exceedance but they are not duplicative. IRO-008-1 addresses actions to prevent or mitigate an IROL exceedance while

IRO-009-1 addresses an actual exceedance and acting to mitigate the magnitude and duration of the exceedance within Tv.

A suggestion was also made to reconsider retiring Requirement R3. The IRO SDT considered retaining the requirement but determined Requirement R3 should be retired. The IRO SDT agrees with the FYRT's determination that the intent of Requirement R3 is not to define a curtailment process when the Interchange Distribution Calculator (IDC) is compromised or unavailable. In the event of an IDC failure, Transmission Loading Relief (TLR) action would be very limited resulting in manual curtailments and other manual actions to preserve the reliability of the Bulk Electric System (BES). The IRO SDT further agrees with the FYRT's assertion that Requirement R3 contains actions that are automatically generated via the IDC tool and sent to proper entities upon issuance of the TLR. This requirement should be removed from the standard, as it meets Paragraph 81 Criterion B1 – Administrative.

One commenter noted that the un-official comment form posted on the project page states that IRO-006-EAST-1 R1 is to be revised under Criterion B7 of Paragraph 81 but the PRT Template form states that R1 is to be retired. The commenter stated that it was their belief that the issue was an error in drafting the Comment form language and that the review template is the correct reference.

The IRO SDT concurs with the commenter and confirms that the review template is the correct reference.

3. IRO-009

At least one commenter suggested the proposal to remove “without delay” from R4 should be carefully considered. The commenter noted that there was a lengthy debate on this issue during the posting and balloting of the previous version of this standard, and that the decision to leave this in the requirement was based primarily on concerns expressed by the regulatory authorities that, without such wording, Responsible Entities could delay taking actions until closer to the end of the Tv period, which would not drive the right behavior to mitigate IROL exceedances as soon as practicable.

It is the IRO SDT's position that the point of time at which the requirement is triggered is inherent in the requirement itself, and that the proposed revisions to the standard adequately support reliability as written. Therefore, the IRO SDT declines to adopt this suggestion.

At least one commenter suggested that the IRO SDT review the Measures section for consistency.

The IRO SDT has reviewed and revised the measures as appropriate for consistency and conformance to current practice.

More than one commenter suggested revision to Requirement R1 and Requirement R4 and provided proposed revision suggestions.

The IRO SDT agrees that clarifying revision will benefit the language of Requirement R1 and Requirement R4, and, as such, has reviewed and revised the language of Requirement R1 and Requirement R4.

More than one commenter stated that the IRO-009 redline is not an accurate reflection of the changes being considered in the standard. It does not show requirement R2 being revised to be Part 1.2, and it does not show requirement R5 being deleted. Standard format does not have Parts of requirements identified with “R”s.

The IRO SDT agrees that the redline to IRO-009-1 is not in the most current standard format, and, as such, has drafted the clean version of IRO-009-2 in the most current standard format.

Several commenters suggested specific revisions to the language and format of the standard.

The IRO SDT has carefully considered each suggestion and reviewed and revised the standard language and formatting as appropriate.

One commenter noted that IRO-009-2 references an IROL Violation Report in EOP-004-1, which is retired, as the form changed to an Event Reporting Form in EOP-004-2, and recommended the SDT change IRO-009-2 to reference the Event Reporting Form in EOP-004-2.

The IRO SDT agrees that IRO-009-2 should not contain a reference to a retired document, and, as such, has ensured the reference is not included in IRO-009-2.

If you feel that your comment has been overlooked, please let us know immediately. Our goal is to give every comment serious consideration in this process. If you feel there has been an error or omission, you can contact the Director of Standards, Valerie Agnew, at 404-446-2566 or at valerie.agnew@nerc.net. In addition, there is a NERC Reliability Standards Appeals Process.¹

¹ The appeals process is in the Standard Processes Manual: http://www.nerc.com/comm/SC/Documents/Appendix_3A_StandardsProcessesManual.pdf

Name	2015-06 IRO IRO-006-East & IRO-009 SAR
Start Date	3/16/2015
End Date	4/15/2015

The Industry Segments are:

- 1 — Transmission Owners
- 2 — RTOs, 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, Regional Entities

Full Name	Entity Name	Segment(s)	Region	Group Name	Group Member Name	Group Member Organization	Group Member Region	Group Member Segment(s)
Ben Engelby	ACES Power Marketing	6		ACES Standards Collaborators - IRO Project	Chip Koloini	Golden Spread Electric Cooperative	SPP	3,5
					Bob Solomon	Hoosier Energy Rural Electric Cooperative, Inc.	RFC	1
Christina Bigelow	Electric Reliability Council of Texas, Inc.	2		IRC Standards Review Committee	Christina Bigelow	ERCOT	TRE	2
					Kathleen Goodman	ISO-NE	NPCC	
					Mark Holman	PJM	RFC	
					Charles Yeung	SPP	SPP	
					Ben Li	IESO	NPCC	
					Greg Campoli	NYISO	NPCC	
					Terry Bilke	MISO	RFC	
					Ali Miremadi	CAISO	WECC	
Michael Lowman	Duke Energy	1,3,5,6	FRCC,SERC,RFC	Mike Lowman on Behalf of Duke Energy	Doug Hils	Duke Energy	RFC	1
					Lee Schuster		FRCC	3
					Dale Goodwine		SERC	5
					Greg Cecil		RFC	6
Lee Pedowitz	Northeast Power Coordinating Council	10	NPCC	NPCC RSC 2015-06	Alan Adamson	New York State Reliability Council, LLC	NPCC	10
					David Burke	Orange and Rockland		3

						Utilities Inc.	
					Greg Campoli	New York Independent System Operator	2
					Sylvain Clermont	Hydro-Quebec TransEnergie	1
					Kelly Dash	Consolidated Edison Co. of New York, Inc.	1
					Gerry Dunbar	Northeast Power Coordinating Council	10
					Kathleen Goodman	ISO - New England	2
					Mark Kenny	Northeast Utilities	1
					Helen Lainis	Independent Electricity System Operator	2
					Alan MacNaughton	New Brunswick Power Corporation	9
					Paul Malozewski	Hydro One Networks Inc.	1
					Bruce Metruck	New York Power Authority	6
					Lee Pedowicz	Northeast Power	10

						Coordinating Council		
					Robert Pellegrini	The United Illuminating Company		1
					Si Truc Phan	Hydro-Quebec TransEnergie		1
					David Ramkalawan	Ontario Power Generation, Inc.		5
					Brian Robinson	Utility Services		8
					Wayne Sipperly	New York Power Authority		5
					Ben Wu	Orange and Rockland Utilities Inc.		1
					Peter Yost	Consolidated Edison Co. of New York, Inc.		3
					Michael Jones	National Grid		1
					Brian Shanahan	National Grid		1
					Silvia Parada Mitchell	NextEra Energy, LLC		5
Jason Smith	Southwest Power Pool, Inc. (RTO)	2	SPP	SPP Standards Review Group	Shannon Mickens	Southwest Power Pool	SPP	2
					James Nail	City of Independence , Missouri		3,5

					Kevin Giles	Westar Energy		1,3,5,6
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1. Do you agree with the recommendation regarding IRO-006-East? If not, please explain specifically what aspects of the recommendation you disagree with.

Charles Yeung - Southwest Power Pool, Inc. (RTO) - 2 - SPP

Selected Answer:

Answer Comment:

Response:

Likes: 0

Dislikes: 0

John Fontenot - Bryan Texas Utilities - 1 -

Selected Answer: Yes

Answer Comment:

Response:

Likes: 0

Dislikes: 0

Dennis Minton - Florida Keys Electric Cooperative Assoc. - 1 -

Selected Answer:

Answer Comment:

Response:

Likes: 0

Dislikes: 0

Kaleb Brimhall - Colorado Springs Utilities - 5 -

Selected Answer:

Answer Comment:

Response:

Likes: 0

Dislikes: 0

Nick Vtyurin - Manitoba Hydro - 1,3,5,6 - MRO

Selected Answer: Yes

Answer Comment:

Response:

Likes: 0

Dislikes: 0

Leonard Kula - Independent Electricity System Operator - 2 -

Selected Answer: No

Answer Comment:

We reiterate the following comments which were submitted in 2013 when the 5-Year Review Team's recommendations were posted for comment:

We do not agree with retiring R1 since it was added to the standard and worded that way to address a FERC directive which asked NERC to clearly include a requirement in the standard that TLR is not an effective means for mitigating IROL violation. The language "...prior to or concurrently with the initiation of the Eastern Interconnection TLR procedure (or continuing management of this procedure if already initiated)" is meant to convey the idea that TLR alone cannot and shall not be used to mitigate IROL exceedances, but can be used together with but not prior to other (presumably more effective) means.

The proposal to retire R3 also needs to be reconsidered. The need for this requirement in view of IDC's automatic generation of the actions contained in R3 was debated at length when the standard was posted for commenting and balloting in 2009. In the end, the vast majority of the industry supported the notion that such actions would be required in the event that the IDC became unavailable. Also, there was the issue with respect to who would be held responsible for communicating these actions given that it was not appropriate for the vendor of IDC to take up this responsibility and ensure the correctness of the communicated actions. We suggest the 5-Year Review Team of the SDT to consult with NERC staff (the IRO-006-5 Standard Developer) and/or the TLR SDT for further details.

Response:**Likes:**

0

Dislikes: 0

Rachel Coyne - Texas Reliability Entity, Inc. - 10 -

Selected Answer:

Answer Comment: Not Applicable for Texas RE.

Response:

Likes: 0

Dislikes: 0

Terry Blilke - Midcontinent ISO, Inc. - 2 -

Selected Answer: Yes

Answer Comment:

Response:

Likes: 0

Dislikes: 0

Kathleen Black - DTE Energy - 3,4,5 - RFC

Selected Answer: Yes

Answer Comment:

Response:

Likes: 0

Dislikes: 0

John Merrell - Tacoma Public Utilities (Tacoma, WA) - 1 -

Selected Answer:

Answer Comment:

Response:

Likes: 0

Dislikes: 0

Michael Lowman - Duke Energy - 1,3,5,6 - FRCC,SERC,RFC

Selected Answer: Yes

Answer Comment:

Response:

Likes: 0

Dislikes: 0

Jason Smith - Southwest Power Pool, Inc. (RTO) - 2 - SPP

Selected Answer: Yes

Answer Comment:

The un-official comment form posted on the project page states that IRO-006-EAST R1 is to be revised under Criterion B7 of Paragraph 81 but the PRT Template form states that R1 is to be retired. We believe this to simply be an error in drafting the Comment form language and that the review template is the correct reference.

We thank the PRT for identifying the redundancy with other standards and requirements and their application of Paragraph 81 Criteria. We agree with the recommended changes developed by the PRT.

Response:

Likes: 0

Dislikes: 0

Lee Pedowicz - Northeast Power Coordinating Council - 10 - NPCC

Selected Answer:

No

Answer Comment:

We do not agree with retiring R1 because it was added to the standard and worded to address a FERC directive. The directive asked NERC to clearly include a requirement in the standard that TLR is not an effective means for mitigating an IROL violation. The language "...prior to or concurrently with the initiation of the Eastern Interconnection TLR procedure (or continuing management of this procedure if already initiated)" is meant to convey the idea that TLR alone cannot and shall not be used to mitigate IROL exceedances, but can be used together with but not prior to other means. Disagree with the retirement of requirement R3 based on Paragraph 81 Criteria B1. Because the Purpose of IRO-006-East is "To provide an interconnection-wide transmission loading relief procedure (TLR) for the Eastern Interconnection that can be used to prevent and/or mitigate potential or actual System Operating Limit (SOL) and Interconnection Reliability Operating Limit (IROL) exceedances to maintain reliability of the Bulk Electric System (BES)." it is important that the RCs communicate this information to other RCs in the Eastern Interconnection. This is administrative in nature, but it does support reliability by providing an abnormal event response procedure to all entities that might be impacted. In past discussions, the vast majority of the industry supported the notion that such actions

would be required in the event that the IDC became unavailable. Also, there was the issue with respect to who would be held responsible for communicating these actions given that it was not appropriate for the vendor of IDC to take responsibility and ensure the correctness of the communicated actions. We suggest the 5-Year Review Team of the SDT to consult with NERC staff (the IRO-006-5 Standard Developer) and/or the TLR SDT discuss and take this into consideration.

Response:

Likes: 0

Dislikes: 0

Mike Smith - Manitoba Hydro - 1 -

Selected Answer: Yes

Answer Comment:

Response:

Likes: 0

Dislikes: 0

Ben Engelby - ACES Power Marketing - 6 -

Selected Answer: Yes

Answer Comment:

(1) While we agree with the recommendations and proposed modifications to IRO-006-EAST-1 and that IRO-006-EAST-1 R1 is redundant with IRO-009-1 R4, we have two concerns. First, we do not agree that IRO-006-EAST-1 R1 is redundant with IRO-008-1 R3 as documented in the five-year review template. Since it is redundant with another requirement this is just documentation issue that the drafting will need to address. Second, we encourage the drafting to review the proposed retirement of IRO-006-EAST-1 with FERC. As we recall, this requirement was added per a FERC directive when IRO-006 was approved.

(2) We agree that R3 is administrative documentation that meets P81 criteria. However, we encourage the drafting team to retain this documentation in the technical or application guidelines. It is helpful for those that do not use the IDC every day to understand how it works.

Response:

Likes: 0

Dislikes: 0

christina bigelow - Electric Reliability Council of Texas, Inc. - 2 -

Selected Answer: Yes

Answer Comment:

NOTE: IESO supports and joins these SRC comments generally, but does not support the retirement of Requirements R1 – R3. MISO and CAISO do not join these SRC comments.

Response:

Likes: 0

Dislikes: 0

2. Do you agree with the recommendation regarding IRO-009-1? If not, please explain specifically what aspects of the recommendation you disagree with.

Charles Yeung - Southwest Power Pool, Inc. (RTO) - 2 - SPP

Selected Answer:

Answer Comment:

Response:

Likes: 0

Dislikes: 0

John Fontenot - Bryan Texas Utilities - 1 -

Selected Answer: Yes

Answer Comment:

Response:

Likes: 0

Dislikes: 0

Dennis Minton - Florida Keys Electric Cooperative Assoc. - 1 -

Selected Answer:

Answer Comment:

Response:

Likes: 0

Dislikes: 0

Kaleb Brimhall - Colorado Springs Utilities - 5 -

Selected Answer:

Answer Comment:

Response:

Likes: 0

Dislikes: 0

Nick Vtyurin - Manitoba Hydro - 1,3,5,6 - MRO

Selected Answer: Yes

Answer Comment:

Response:

Likes: 0

Dislikes: 0

Leonard Kula - Independent Electricity System Operator - 2 -

Selected Answer: Yes

Answer Comment:

As indicated in our comments submitted during the posting of the 5-Year Review Team's recommendations in 2013, the proposal to remove "without delay" from R4 needs to be carefully considered. There was a lengthy debate on this during the posting and balloting of the previous version of this standard. The decision to leave this in the requirement was based primarily on concerns expressed by the regulatory authorities that, without such wording, Responsible Entities could delay taking actions until closer to the end of the Tv period. This would not drive the right behavior to mitigate IROL exceedances as soon as practicable. Please consult FERC staff and the NERC facilitator (Standard Developer) for the project and/or the Reliability Coordination SDT.

Response:

Likes: 0

Dislikes: 0

Rachel Coyne - Texas Reliability Entity, Inc. - 10 -

Selected Answer: Yes

Answer Comment:

Response:

Likes: 0

Dislikes: 0

Terry Bllke - Midcontinent ISO, Inc. - 2 -

Selected Answer: Yes

Answer Comment:

Response:

Likes: 0

Dislikes: 0

Kathleen Black - DTE Energy - 3,4,5 - RFC

Selected Answer: Yes

Answer Comment:

Response:

Likes: 0

Dislikes: 0

John Merrell - Tacoma Public Utilities (Tacoma, WA) - 1 -

Selected Answer:

Answer Comment:

Tacoma Power suggests that the Measures section be consistent. Measures M1 and M3 include language that refers to corresponding requirements. For example, Measure M1 includes "...in accordance with Requirement R1"; Measure M3 includes "...in accordance with Requirement R3". Measures M2 and M4, however, do not include references to their applicable requirements.

Response:

Likes: 0

Dislikes: 0

Michael Lowman - Duke Energy - 1,3,5,6 - FRCC,SERC,RFC

Selected Answer: Yes

Answer Comment:

Duke Energy suggests the following modification to R4:

“When mitigating the magnitude and duration of an IROL, and unanimity cannot be reached, each Reliability Coordinator that

monitors that Facility (or group of Facilities) shall use the most limiting of the values under consideration.”

We believe this allows Requirement 4 to be a stand-alone requirement and would not have to refer to other requirements for interpretation.

Response:

Likes: 0

Dislikes: 0

Jason Smith - Southwest Power Pool, Inc. (RTO) - 2 - SPP

Selected Answer: Yes

Answer Comment: We agree the revisions in IRO-009-1 improve the clarity of the Standard overall and provide a valid correction to the VSL on R3 regarding the five-minute timeframe.

Response:

Likes: 0

Dislikes: 0

Lee Pedowicz - Northeast Power Coordinating Council - 10 - NPCC

Selected Answer:

No

Answer Comment:

The posted IRO-009 redline is not an accurate reflection of the changes being considered in the standard. It does not show requirement R2 being revised to be Part 1.2, and it does not show requirement R5 being deleted. Standard format does not have Parts of requirements identified with "R"s.

It is not necessary to add Parts 1.1 and 1.2 (shown as R1.1 and R1.2). Requirement R1 wording can be revised to "...that can be implemented in time to prevent to prevent exceeding each of the identified IROL Tv."

In requirement R4, suggest revising the wording to "...immediately use the most limiting of the values under consideration to minimize the impact on reliability."

As indicated in comments submitted during the posting of the 5-Year Review Team's recommendations in 2013, the proposal to remove "without delay" from R4 needs to be carefully considered. There was a lengthy debate on this during the posting and balloting of the previous version of this standard. The decision to leave this in the requirement was based primarily on concerns expressed by the regulatory authorities that, without such wording, Responsible Entities could delay taking actions until closer to the end of the Tv period. This would not drive the right behavior to mitigate IROL exceedances as soon as practicable.

Response:

Likes: 0

Dislikes: 0

Mike Smith - Manitoba Hydro - 1 -

Selected Answer: Yes

Answer Comment:

Response:

Likes: 0

Dislikes: 0

Ben Engelby - ACES Power Marketing - 6 -

Selected Answer: Yes

Answer Comment: (1) R1 should be modified to use the approved format for NERC standards. Standards should use numbered lists or bullets in place of sub-requirements.

Response:

Likes: 0

Dislikes: 0

christina bigelow - Electric Reliability Council of Texas, Inc. - 2 -

Selected Answer: Yes

Answer Comment:

The SRC suggests that the recommendations are appropriate, but has concerns regarding the potential redlines provided. More specifically, the SRC suggests that:

- Different interpretations regarding “expected” versus “actual” system conditions have been observed throughout the time period for

which IRO-009 has been effective. Consistent definitions between the “expected” versus “actual” system conditions would be valuable to the reliability of the BES and would help to ensure that the data gathered for metrics related to IROL exceedances remains effective, accurate, and indicative of the impact of IROL exceedances on the BES. The SDT should evaluate how these terms can be clarified.

- Terms such as “use” introduce ambiguity and should be evaluated for a determination of whether a more defined, specific action is expected and/or can be articulated.
- The SDT should evaluate and revise the replaced requirement numbers as necessary to ensure accurate mapping between new and retired requirements. In particular, the SRC has identified two potential issues:
 - R1.2 is a replacement for the old Requirement R2 (not a replacement for the incorrectly referenced R 1.1 which did not exist).
 - The comment form states that Requirements R1, R4, and R5 are to be revised, but, in the redline, there is no Requirement R5.
- The SRC suggests that the phrase “each of the identified IROLs such that each IROL...,” which was added to Requirement R2 is redundant and should be revised to state “the identified IROL such that it...” More specifically, because Requirement R1 starts with the phrase “For each IROL...,” which phrase already limits the sub requirements to a single identified IROL.
- The SRC cannot support the proposal to remove “without delay” from R4. There was a lengthy debate on the use of this term previously and the decision to leave this in the requirement was based on concerns (particularly of the regulatory authorities) that, without such wording, Responsible Entities could delay taking actions until closer to the end of the Tv period. This would not drive the right behavior to mitigate IROL exceedances as soon as practicable.

NOTE: MISO and CAISO do not join these SRC comments.

Response:

Likes: 0

Dislikes: 0

3. If you have any other comments on the Five-Year Review Recommendation that you have not already mentioned above, please provide them here:

Charles Yeung - Southwest Power Pool, Inc. (RTO) - 2 - SPP

Selected Answer:

Answer Comment:

Response:

Likes: 0

Dislikes: 0

John Fontenot - Bryan Texas Utilities - 1 -

Selected Answer:

Answer Comment:

Response:

Likes: 0

Dislikes: 0

Dennis Minton - Florida Keys Electric Cooperative Assoc. - 1 -

Selected Answer:

Answer Comment:

Response:

Likes: 0

Dislikes: 0

Kaleb Brimhall - Colorado Springs Utilities - 5 -

Selected Answer:

Answer Comment:

Response:

Likes: 0

Dislikes: 0

Nick Vtyurin - Manitoba Hydro - 1,3,5,6 - MRO

Selected Answer:

Answer Comment:

Response:

Likes: 0

Dislikes: 0

Leonard Kula - Independent Electricity System Operator - 2 -

Selected Answer:

Answer Comment:

Response:

Likes: 0

Dislikes: 0

Rachel Coyne - Texas Reliability Entity, Inc. - 10 -

Selected Answer:

Answer Comment:

Texas RE noticed IRO-009-2 references an IROL Violation Report in EOP-004-1, which is retired. The form changed to an Event Reporting Form in EOP-004-2. Texas RE recommends the SDT change IRO-009-2 to reference the Event Reporting Form in EOP-004-2.

Response:

Likes: 0

Dislikes: 0

Terry Blilke - Midcontinent ISO, Inc. - 2 -

Selected Answer:

Answer Comment:

Response:

Likes: 0

Dislikes: 0

Kathleen Black - DTE Energy - 3,4,5 - RFC

Selected Answer:

Answer Comment:

Response:

Likes: 0

Dislikes: 0

John Merrell - Tacoma Public Utilities (Tacoma, WA) - 1 -

Selected Answer:

Answer Comment:

Response:

Likes: 0

Dislikes: 0

Michael Lowman - Duke Energy - 1,3,5,6 - FRCC,SERC,RFC

Selected Answer:

Answer Comment:

Response:

Likes: 0

Dislikes: 0

Jason Smith - Southwest Power Pool, Inc. (RTO) - 2 - SPP

Selected Answer:

Answer Comment:

Response:

Likes: 0

Dislikes: 0

Lee Pedowicz - Northeast Power Coordinating Council - 10 - NPCC

Selected Answer:

Answer Comment:

Response:

Likes: 0

Dislikes: 0

Mike Smith - Manitoba Hydro - 1 -

Selected Answer:

Answer Comment:

Response:

Likes: 0

Dislikes: 0

Ben Engelby - ACES Power Marketing - 6 -

Selected Answer:

Answer Comment:

Response:

Likes: 0

Dislikes: 0

christina bigelow - Electric Reliability Council of Texas, Inc. - 2 -

Selected Answer:

Answer Comment:

Recommendations for consideration are: • Modify the requirements to improve its clarity and measurability while removing ambiguity.

NOTE: MISO and CAISO do not join these SRC comments.

Response:

Likes: 0

Dislikes: 0