Unofficial Comment Form
Project 2015-06 Interconnection Reliability Operations and Coordination

DO NOT use this form for submitting comments. Use the electronic form to submit comments on IRO-006-EAST and IRO-009 and associated documents. The electronic comment form must be completed by 8:00 p.m. Eastern July 08, 2015.

If you have questions, contact Katherine Street (via email) or by telephone at 404.446.9702.

Project 2015-06 Interconnection Reliability Operations and Coordination

Background Information

This project involves the following two IRO standards:

- IRO-006-EAST-2 – Transmission Loading Relief Procedure for the Eastern Interconnection
- IRO-009-2 – Reliability Coordinator Actions to Operate Within IROLs

Project 2015-06 was initiated in response to work done by the Project 2012-09 Interconnected Reliability Operations Five-Year Review Team (FYRT). As the five-year review has resulted in a recommendation to revise IRO-006-EAST-1 and IRO-009-1, a separate drafting team has been tasked with Project 2015-06, which is implementing the Project 2012-09 IRO FYRT’s recommendations on IRO-006-East-1 and IRO-009-1.

The FYRT reviewed IRO-003-2, IRO-004-2, IRO-005-4, IRO-006-5, IRO-006-East-1, IRO-008-1, IRO-009-1 and IRO-010-1a and posted eight draft recommendations for industry comment. All standards were recommended for revision except for IRO-006-5, which was presented to the NERC Board of Trustees (Board) for reaffirmation. A final set of recommendations and a Standard Authorization Request (SAR) were submitted to the Standards Committee (SC) in October 2013. However, Project 2014-03, Revisions to TOP and IRO Standards, retired IRO-003-2, IRO-004-2, IRO-005-4, IRO-008-1, and IRO-010-1a, leaving only IRO-006-East-1 and IRO-009-1 recommended for revision.

The IRO Standard Drafting Team (IRO SDT) has implemented the FYRT recommendations. Since Project 2012-09 was scoped, a number of initiatives have been implemented to improve the overall quality of the NERC standards, including retirement of unnecessary or redundant requirements under Paragraph 81 of the Federal Energy Regulatory Commission’s March 15, 2012 order¹, consideration of Independent Expert Review Panel recommendations, and implementation of results-based concepts in the standards.

The IRO SDT considered elements of the five-year review and industry comments, including those that resulted from the SAR 30-day informal comment period for Project 2015-06, as it implemented the FYRT’s recommendations.

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¹ Order Accepting with Conditions the Electric Reliability Organization’s Petition Requesting Approval of New Enforcement Mechanisms and Requiring Compliance Filing, 138 FERC ¶61,193 (2012).
Questions

You do not have to answer all questions. Enter comments in simple text format. Bullets, numbers, and special formatting will not be retained.

1. The IRO SDT recommends retiring IRO-006-EAST-1 Requirement R1. Do you agree with the retirement of IRO-006-EAST-1 Requirement R1? If not, please explain specifically what aspects of the retirement you disagree with.

☐ Yes
☒ No

Comments: The SDT should reconsider retiring R1 because the requirement was added to the standard and worded in such a way to address a FERC directive in Order 693 which asked NERC to clearly include a requirement in the standard that TLR is not an effective means for mitigating IROL violation.

2. The IRO SDT recommends revising IRO-006-EAST-1 Requirement R2. Do you agree with the proposed revisions to IRO-006-EAST-1 Requirement R2? If not, please explain specifically what aspects of the revisions you disagree with and propose alternative language.

☐ Yes
☒ No

Comments: Where is the RC to update the TLR implementation information? The update of “at least every clock hour” is the minimum. The implementation information should be updated as system conditions change. Suggest changing the wording to:

“…and shall update this information as changes in system warrant deliberate changes to the in force implemented TLR procedure, and at least hourly…”

3. The IRO SDT recommends retiring IRO-006-EAST-1 Requirement R3. Do you agree with the retirement of IRO-006-EAST-1 Requirement R3? If not, please explain specifically what aspects of the retirement you disagree with.

☐ Yes
☒ No

Comments: If the acronym IDC is to stay with the standard, it should be spelled out at its initial usage, with the acronym being used subsequently.
Suggest not using the word “ensure” in the Purpose. Consider revising the wording of the Purpose to:

To coordinate action between Reliability Coordinators within the Eastern Interconnection when implementing transmission loading relief procedures (TLR) for the Eastern Interconnection to prevent or manage potential or actual System Operating Limit (SOL) and Interconnection Reliability Operating Limit (IROL) exceedances to maintain reliability of the Bulk Electric System (BES).

The SDT should consider the following:

a. The need for this requirement 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 assume this responsibility and ensure the correctness of the communicated actions.

b. If the SDT’s position is that in the event of an IDC failure, TLR action will be very limited resulting in manual curtailments and other manual actions to preserve the reliability of the Bulk Electric System, then we suggest the SDT to add a condition in R1 (previously R2), to read as follows (addition in square brackets):

R1. Each Reliability Coordinator that initiates the Eastern Interconnection TLR procedure [through the Interchange Distribution Calculator (IDC)] to prevent or mitigate an SOL or IROL exceedance shall identify......

This will effectively remove the need to implement TLRs when the IDC is unavailable.

Add the above wording to R2 to address the situation when IDC is not available.

4. The IRO SDT recommends revising IRO-006-EAST-1 Requirement R4. Do you agree with the proposed revisions to IRO-006-EAST-1 Requirement R4? If not, please explain specifically what aspects of the revisions you disagree with and propose alternative language.

☐ Yes
☐ No
Comments:
5. The IRO SDT recommends revising IRO-009-1 Requirement R1 to include elements of IRO-009-1 Requirement R2. Do you agree with the proposed revisions to IRO-009-1 Requirement R1? If not, please explain specifically what aspects of the revisions you disagree with and propose alternative language.

☐ Yes
☒ No

Comments: To be consistent with in place standard formatting, Requirement R1 should be revised to read:

R1. Each Reliability Coordinator shall have one or more Operating Processes, Procedures, or Plans that identify actions it the Reliability Coordinator shall take, or actions it shall direct others to take for each IROL that the Reliability Coordinator identifies one or more days prior to the current day.

We agree with the proposed changes, but suggest rewording Part 1.2 as follows to improve clarity (added word in square bracket):

1.2 To mitigate the magnitude and duration of an IROL exceedance such that the IROL [exceedance] is relieved within the IROL’s Tv.

The added word is needed since IROL is a limit, whose relief is not required; but its exceedance needs to be relieved.

6. The IRO SDT recommends revising IRO-009-1 Requirement R3. Do you agree with the proposed revisions to IRO-009-1 Requirement R3? If not, please explain specifically what aspects of the revisions you disagree with and propose alternative language.

☒ Yes
☐ No

Comments:
7. The IRO SDT recommends revising IRO-009-1 Requirement R4. Do you agree with the proposed revisions to IRO-009-1 Requirement R4? If not, please explain specifically what aspects of the revisions you disagree with and propose alternative language.

☐ Yes
☐ No
Comments:

8. The IRO SDT recommends revising IRO-009-1 Requirement R5. Do you agree with the proposed revisions to IRO-009-1 Requirement R5? If not, please explain specifically what aspects of the revisions you disagree with and propose alternative language.

☐ Yes
☐ No
Comments:

9. If you have any other comments that you have not already mentioned above, please provide them here:

Comments: Regarding IRO-009-1: R1 refers to ‘Operating Processes, Procedures, or Plans that identify actions’... R2 refers to ‘...one or more Operating Processes, Procedures or Plans (not limited to the Operating Processes, Procedures, or Plans developed for Requirements R1)......why wouldn’t every potential process, procedure or plan available as an option in R2 also be included in R1?....in other words if its available for R2 should it not also be an ‘action’ available for R1?

Remove the second “that” from Measure M1 to have it read”... along with one or more dated Operating Processes, Procedures, or Plans that will be used.”

Since Requirement R2 specifies that operating processes, procedures and plans not be limited to those developed in R1, and since R3 makes no reference to R1, the Measures M2 and M3 should not refer to R1 when enumerating types of evidence.

R2 calls for RC to initiate one or more Operating Processes, Procedures and Plans... Therefore, the VSL should take into account that the RC may have only initiated one of the many necessary procedures or plans to prevent the IROL exceedance. Presently the VSL only considers no Operating Processes, Plans or Procedures initiated.

Add the following text either to Severe VSL or High VSL: The RC did not initiate all Operating Processes, Procedures and Plans that could have prevented an IROL exceedance.