Unofficial Comment Form
Project 2012-09 Interconnection Operations and Coordination

Please DO NOT use this form for submitting comments. Please use the electronic form to submit comments on the draft Five-Year Review Recommendation on the IRO body of standards. A group of Five-Year Review templates that shows the scope of the recommended changes is also posted for information. The electronic comment form must be completed by 8:00 p.m. ET September 20, 2013.

If you have questions please contact Stephen Crutchfield (via email) or by telephone at 609.651.9455.

Project Page

Background Information
The Standards Committee assigned eight subject matter experts to review the IRO standards as part of NERC’s obligation to conduct periodic reviews of its standards. The Five-Year Review Team recommends certain revisions to the IRO standards to provide greater clarity and to sharpen industry focus on tasks that have a more direct impact on reliability. As required by the NERC Standard Processes Manual, this recommendation is being posted for stakeholder comment prior to being finalized and submitted to the Standards Committee.

The IRO Five-Year Review Team (FYRT) recommends the following actions on the standards reviewed, as further explained in the corresponding review template for each standard:

- **IRO-003-2**: Revise Requirements R1 and R2 and to address the directives in FERC Order 693.
- **IRO-004-2**: Retire Requirement R1 under Criterion B7 of Paragraph 81; as well as Requirements R2 and R3 upon regulatory approval of IRO-001-3.
- **IRO-005-4**: Revise Requirement R1.
- **IRO-006-5**: Affirm IRO-006-5.
- **IRO-006-East**: Revise Requirement R1 under Criterion B7 of Paragraph 81 and retire Requirement R3 under Criterion B1 of Paragraph 81. The IRO FYRT further recommends revising Requirements R2 and R4.
- **IRO-008-1**: Retire Requirement R3 under Criterion B7 of Paragraph 81, and make errata revisions to Requirement R2 and the Purpose Statement.
- **IRO-009-1**: Revise Requirements R1, R4, R5, the Purpose Statement, as well as the High VSL for Requirement R4.
- **IRO-010-1a**: Revise Requirement R1, the Applicability Section and the Purpose Statement.
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. Do you agree with the recommendation regarding IRO-003-2? If not, please explain specifically what aspects of the recommendation you disagree with.

☐ Yes
☐ No
Comments:

2. Do you agree with the recommendation regarding IRO-004-2, and the corresponding recommendations for revising IRO-001-3 (provided as a redline of IRO-001-3)? If not, please explain specifically what aspects of the recommendation you disagree with.

☐ Yes
☒ No
Comments: As per the expert review, delete IRO-004 R1 (duplicative) and IRO-014 R2, R4 (administrative), R7 and R8 (duplicative).

The Background Information (above on the Comment Form) reads “Retire Requirement R1 under Criterion B7 of Paragraph 81; as well as Requirements R2 and R3 upon regulatory approval of IRO-001-3.” IRO-004-2 only has one requirement.

There is no justification for adding the TSP to R2 and R3 of IRO-001-4. If the intent is to curtail transmission service or transactions using such service, this can currently be accomplished by one of the operating entities (BA, TOP or RC) using existing procedures such as TLR and redispach. The Purpose statements of each Standard should be reviewed to ensure that the combined Standard adequately addresses both.
3. Do you agree with the recommendation regarding IRO-005-4? If not, please explain specifically what aspects of the recommendation you disagree with.

☐ Yes
☐ No
Comments:

4. Do you agree with the recommendation regarding IRO-006-5? If not, please explain specifically what aspects of the recommendation you disagree with.

☒ Yes
☐ No
Comments:

5. Do you agree with the recommendation regarding IRO-006-East? If not, please explain specifically what aspects of the recommendation you disagree with.

☒ Yes
☐ No
Comments: Suggest referencing the specific NAESB business practice associated with the retirement of Requirement R1 for completeness.

6. Do you agree with the recommendation regarding IRO-008-1? If not, please explain specifically what aspects of the recommendation you disagree with.

☒ Yes
☐ No
Comments:

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

☒ Yes
☐ No
Comments:
8. Do you agree with the recommendation regarding IRO-010-1a? If not, please explain specifically what aspects of the recommendation you disagree with.

☒ Yes
☐ No
Comments:

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

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