

Unofficial Comment Form

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

DO NOT use this form for submitting comments. Use the [electronic form](#) to submit comments on the draft Five-Year Review Recommendation on the IRO body of standards. Two Five-Year Review templates that show the scope of the recommended changes is also posted for information. The electronic comment form must be completed by 8:00 p.m. ET **April 15, 2015**.

If you have questions please contact [Katherine Street](#) (via email) or by telephone at 404-446-9702.

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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 recommended 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. This recommendation is being posted for stakeholder comment prior to initiation of the Project 2015-06 Interconnection Reliability Operations and Coordination Standards Drafting Team.

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

- 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-009-1:** Revise Requirements R1, R4, R5, the Purpose Statement, as well as the High VSL for Requirement R4.

Questions

1. 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: 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.

2. 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: 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.

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

Comments: