

RSSC Members:

In a previous e-mail dated July 6<sup>th</sup>, we had indicated that the IESO Regulatory Affairs is working on its response to **FERC Order 693** (Draft Requests for Data relating to **1**) Restoration of Nuclear Power Plant Offsite Power Source Data Request, **2**) Interconnection Reliability Operating Limit Data Request, and **3**) Transmission Planning Data Request).

Our response was filed with NERC today and is attached alongside for your review. Please let us know if there are any concerns or need for additional information.

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**Sent:** July 6, 2007 11:03 AM  
**Subject:** NERC Data Requests

RSSC Members:

**Rules of Procedure, Section 1600:** As you are aware from our discussions at the June 20<sup>th</sup> RSSC meeting, the North American Electric Reliability Corporation (NERC) has requested comments on its proposal to amend its Rules of Procedure to establish a new rule (a new Section 1600) that sets forth a process for NERC or a regional entity to issue requests for data or information which is necessary for either organization to fulfill its obligations. The entire request document is located at:

[ftp://www.nerc.com/pub/sys/all\\_updl/rop/Request-for-Comment-Section-1600-052107.pdf](ftp://www.nerc.com/pub/sys/all_updl/rop/Request-for-Comment-Section-1600-052107.pdf)

The IESO comments to NERC on the Rules of Procedure, Section 1600, are attached alongside for your review and comments.

**Order 693 Data Request Requirements:** In addition to the above, NERC is also soliciting comments from industry participants on three draft requests for data it needs to fulfill requirements identified in the Federal Energy Regulatory Commission's (FERC) Order No. 693. These data requests are related to **1**) Restoration of Nuclear Power Plant Offsite Power Source Data Request, **2**) Interconnection Reliability Operating Limit Data Request, and **3**) Transmission Planning Data Request. The complete request from NERC is attached alongside.

Regarding the above-mentioned request, the IESO has concluded that it would not be supporting or providing data requested for the first 2 requests but would provide information for the 3<sup>rd</sup> request which would be coordinated with its Regional A2 requirements. The IESO Regulatory Affairs is planning to draft a response to this effect before the 24<sup>th</sup> which we will share with you. Any comments or feedback from you would be greatly appreciated.

July 24, 2007

Mr. Gerry Adamski  
Director of Standards  
North American Electric Reliability Corporation

Dear Gerry:

**Re: DRAFT Requests for Data to Fulfill FERC Order No. 693 Requirements**

I am writing on behalf of the IESO in response to the solicitation for comments with respect to three draft requests for data needed to fulfill requirements identified in the Federal Energy Regulatory Commission's (FERC) Order No. 693. According to NERC, responses to these data requests will enable NERC to respond in a timely manner to directives located in paragraphs 629, 951, and 1693 of the Order: Restoration of Nuclear Power Plant Offsite Power Source Data Request, Interconnection Reliability Operating Limit Data Request, and Transmission Planning Data Request respectively.

In its solicitation for comments, NERC explains that the legal basis in the United States for these requests is Section 39.2(d) of the FERC regulations and section 215 of the Federal Power Act. NERC also states that its approach for requesting data is generally consistent with the approach outlined in NERC's proposed data rule, Section 1600. The IESO submitted comments to NERC on July 3<sup>rd</sup>, 2007 in response to the May 21<sup>st</sup> request for comment on the proposed rule.

In each of the three draft requests for data, NERC explains that the data will be collected and provided to FERC primarily in response to FERC directives. Given that the IESO is non-jurisdictional and that the use of the data is not specified in the request the IESO will not be providing the data requested in Attachments A and B on behalf of Ontario. Attachment C states that the data will also be used for NERC reliability purposes. As such, the IESO will provide this data as NERC states that the reliability information will be used by the Planning Committee and/or the NERC standards draft teams related to Project 2006-02 (*Transmission Assessment and Plans*). Similar to our Section 1600 comments, NERC should seek the IESO's permission before providing this information to external governmental authorities.

On the issue of IROL's the IESO also notes that the industry appears to have different interpretations, treatments and calculation methodologies relating to IROL's. To address this issue NERC's Operating Limit Development Task Force (OLDTF) is developing a concept paper, soliciting industry inputs and pursuing consensus on the various aspects of IROL's. We believe that it is prudent that this work be allowed to continue to completion before any changes to IROL methodologies, via NERC's standards process, are proposed.

I want to stress that the IESO continues to support an effective international ERO. In this regard, the IESO will continue to provide NERC with data and information required to improve the reliability of the bulk power system.

Respectfully Submitted,

Kim Warren  
Manager, Regulatory Affairs  
Independent Electricity System Operator of Ontario