

Comment Form — IROL Standards

Please use this form to submit comments on the proposed IROL standards. Comments must be submitted by **February 15, 2007**. You may submit the completed form by e-mail to sarcomm@nerc.com with the acronym "IROL" in the subject line. If you have questions please contact Maureen Long at maureen.long@nerc.net or by telephone at 609-452-8060.

Individual Commenter Information		
(Complete this page for comments from one organization or individual.)		
Name:	Ron Falsetti	
Organization:	IESO	
Telephone:	906-855-6187	
E-mail:	ron.falsetti@ieso.ca	
NERC Region	<input type="checkbox"/>	Registered Ballot Body Segment
<input type="checkbox"/> ERCOT	<input type="checkbox"/>	1 — Transmission Owners
<input type="checkbox"/> FRCC	<input checked="" type="checkbox"/>	2 — RTOs and ISOs
<input type="checkbox"/> MRO	<input type="checkbox"/>	3 — Load-serving Entities
<input checked="" type="checkbox"/> NPCC	<input type="checkbox"/>	4 — Transmission-dependent Utilities
<input type="checkbox"/> RFC	<input type="checkbox"/>	5 — Electric Generators
<input type="checkbox"/> SERC	<input type="checkbox"/>	6 — Electricity Brokers, Aggregators, and Marketers
<input type="checkbox"/> SPP	<input type="checkbox"/>	7 — Large Electricity End Users
<input type="checkbox"/> WECC	<input type="checkbox"/>	8 — Small Electricity End Users
<input type="checkbox"/> NA – Not Applicable	<input type="checkbox"/>	9 — Federal, State, Provincial Regulatory or other Government Entities
	<input type="checkbox"/>	10 - Regional Reliability Organizations; Regional Entities

Background Information:

The IROL standards were placed in a holding pattern for two years while waiting for the completion of the standards that require entities to document and use their methodology for developing SOLs and IROLs. FAC-010-1 — System Operating Limits Methodology for the Planning Horizon, FAC-011-1 — System Operating Limits Methodology for the Operations Horizon, and FAC-014-1 — Establish and Communicate System Operating Limits, were all adopted by the NERC Board of Trustees on November 1, 2006. While waiting for these standards to be approved by applicable regulatory authorities, the drafting team has been given the authority to move ahead in refining the set of IROL standards.

Changes to Set of Standards

When last posted, there were seven standards in this set of IROL standards:

- IRO-007 — Monitoring the Wide Area
- IRO-008 — Reliability Coordinator Analyses and Assessments
- IRO-009 — Reliability Coordinator Actions to Operate Within IROLs
- IRO-010 — Reliability Coordinator Data Specification and Collection
- IRO-011 — Providing Data to the Reliability Coordinator
- IRO-012 — Procedures, Processes or Plans for Preventing and Mitigating IROLs
- IRO-013 — Reliability Coordinator Directives Relative to IROLs

Consolidation of Related Requirements

The revised set of standards posted for comment includes only IRO-007 through IRO-010. The drafting team is recommending the following changes to the original set of standards for the reasons stated below:

- Consolidate IRO-010 and IRO-011 into a single standard
- Consolidate IRO-009 and IRO-012 into a single standard
- Transfer IRO-013 to Project 2007-02 — Operating Personnel Communications Protocols

Many stakeholders have indicated that splitting requirements for related tasks across multiple standards leads to cross-referencing between standards that can be confusing — for this reason the drafting team is proposing that the related IROL standards be consolidated to eliminate cross-referencing.

During the drafting work done by the Missing Measures and Compliance Elements Standards Drafting Team, stakeholders indicated that duplication of requirements should be eliminated. In support of these comments, the drafting team recommends moving the requirements from *IRO-013 — Reliability Coordinator Directives Relative to IROLs* into the project that will address communication protocols so that all requirements related to directives will be comprehensively addressed without duplication under the single *Project 2007-02 — Operating Personnel Communication Protocols*.

Conforming Changes to Already Approved Standards

The drafting team reviewed already-approved standards that include requirements for the Reliability Coordinator relative to operating within SOLs or IROLs and is recommending conforming changes to those already-approved standards. The implementation plan provides the justification for each of these recommended changes.

- The drafting team is recommending retirement of most of the requirements assigned to the Reliability Coordinator for real-time operation within SOLs — they should be assigned to the Transmission Operator. Every facility in the Transmission Operator's area has a System Operating Limit, but the Reliability Coordinator isn't required to see all these limits and may not have information to determine the cause of instances of exceeding these limits.
- The drafting team is recommending that requirements that describe possible types of acceptable behavior be replaced with requirements that identify the required performance, as in the case of recommending that IRO-005-2 R3 be retired when IRO-009-1 becomes effective.
- In many cases the drafting team would have recommended additional changes to the requirements in already approved standards, but doing so would be outside the scope of the SAR assigned to this drafting team and the changes can be accomplished when the standards are updated as part of the *Reliability Standards Development Plan: 2007–2009*.

Conforming Changes to Bring Standards into Alignment with Reliability Standards Development Procedure V6 and ERO Rules of Procedure

A new version of the Reliability Standards Development Procedure was approved by the NERC Board of Trustees on November 1, 2006. The drafting team made the following changes to the standards to bring them into conformance with the revised manual or other changes needed to conform to the ERO Rules of Procedure:

1. Modified the format of the “Proposed Effective Dates”

The drafting team modified the proposed effective dates to reflect that the standards cannot become effective until approved by applicable regulatory authorities. The drafting team estimated that it will take approximately three months following Board of Trustee adoption, to obtain regulatory approval from FERC and Canadian authorities.

2. Added Violation Risk Factors to each requirement

Violation risk factors identify the potential impact to reliability when the associated requirement has been violated. The following categories of violation risk factors were approved with the latest version of the Reliability Standards Development Procedure:

A High Risk Factor requirement:

(a) is one that, if violated, could directly cause or contribute to bulk power system instability, separation, or a cascading sequence of failures, or could place the bulk power system at an unacceptable risk of instability, separation, or cascading failures; or

(b) is a requirement in a planning time frame that, if violated, could, under emergency, abnormal, or restorative conditions anticipated by the preparations, directly cause or contribute to bulk power system instability, separation, or a cascading sequence of failures, or could place the bulk power system at an unacceptable risk of instability, separation, or cascading failures, or could hinder restoration to a normal condition.

A Medium Risk Factor requirement

(a) is a requirement that, if violated, could the ability to effectively monitor and control the bulk power system, but is unlikely to lead to bulk power system instability, separation, or cascading failures; or

(b) is a requirement in a planning time frame that, if violated, could, under emergency, abnormal, or restorative conditions anticipated by the preparations, directly affect the electrical state or capability of the bulk power system, or the ability to effectively monitor, control, or restore the bulk power system, but is unlikely, under emergency, abnormal, or restoration conditions anticipated by the preparations, to lead to bulk power system instability, separation, or cascading failures, nor to hinder restoration to a normal condition.

A Lower Risk Factor requirement is administrative in nature and

(a) is a requirement that, if violated, would not be expected to affect the electrical state or capability of the bulk power system, or the ability to effectively monitor and control the bulk power system; or

(b) is a requirement in a planning time frame that, if violated, would not, under the emergency, abnormal, or restorative conditions anticipated by the preparations, be expected to affect the electrical state or capability of the bulk power system, or the ability to effectively monitor, control, or restore the bulk power system.

The drafting team added violation risk factors for each requirement. (For this set of BAL standards, the violation risk factors drafting team provided the violation risk factors already identified by stakeholders. If stakeholders indicate that some of the risk factors posted November 2 through December 1, 2006 need modification, the Balance Resources and Demand Standards Drafting Team will make conforming changes to the risk factors in these standards.)

3. Added a Mitigation Time Horizon to each requirement

The ERO Rules of Procedure include the use of Mitigation Time Horizons as one element used to determine the size of sanctions. The drafting team used the following guidelines in developing mitigation time horizons for each requirement:

- **Long-term Planning:** a planning horizon of one year or longer.
- **Operations Planning:** operating and resource plans from day-ahead up to and including seasonal.
- **Same-day Operations:** routine actions required within the timeframe of a day, but not real-time.
- **Real-time Operations:** actions required within one hour or less to preserve the reliability of the bulk electric system.
- **Operations Assessment:** follow-up evaluations and reporting of real time operations.

4. Changed the identification of the Compliance Monitor

The drafting team modified all references to the Regional Reliability Organization as the Compliance Monitor, and replaced these references with, "Electric Reliability Organization."

5. Deleted Levels of Non-compliance – Added Violation Severity Levels

The drafting team deleted "levels of non-compliance" and added "violation severity levels" to comply with the revised Reliability Standards Development Procedure. Compliance personnel assisted the drafting team in using the following criteria from the manual to establish violation severity levels:

- **Lower:** mostly compliant with minor exceptions — The responsible entity is mostly compliant with and meets the intent of the requirement but is deficient with respect to one or more minor details. Equivalent score: 95% to 99% compliant.
- **Moderate:** mostly compliant with significant exceptions — The responsible entity is mostly compliant with and meets the intent of the requirement but is deficient with respect to one or more significant elements. Equivalent score: 85% to 94% compliant.
- **High:** marginal performance or results — The responsible entity has only partially achieved the reliability objective of the requirement and is missing one or more significant elements. Equivalent score: 70% to 84% compliant.
- **Severe:** poor performance or results — The responsible entity has failed to meet the reliability objective of the requirement. Equivalent score: less than 70% compliant.

6. Added 'Associated Documents' where applicable

The drafting team added a section "F" to the standard called, "Associated Documents" to list items such as forms, related standards, reports, etc.

On the following pages, the drafting team will ask for your feedback on the appropriateness of the changes it made to this set of standards. Because the changes made to the set of standards included a great deal of consolidation, a red line version will not be posted as it is not distinguish the content changes from the format changes when comparing the two versions.

You do not have to answer all questions.

Insert a "check" mark in the appropriate boxes by double-clicking the gray areas.

1. The drafting team consolidated the requirements for *IRO-010— Reliability Coordinator Data Specification and Collection* and *IRO-011— Providing Data to the Reliability Coordinator* into a single standard to eliminate the cross-reference between the two standards. Do you agree with consolidating the requirements into a single standard? If not, please explain.

Yes

No

Comments:

2. The drafting team consolidated the requirements for *IRO-009 — Reliability Coordinator Actions to Operate within IROLs* and *IRO-012— Procedures, Processes or Plans for Preventing and Mitigating IROLs* into a single standard to eliminate the cross-reference between the two standards. Do you agree with consolidating the requirements into a single standard? If not, please explain.

Yes

No

Comments:

3. The drafting team recommends moving the requirements from *IRO-013 —Reliability Coordinator Directives Relative to IROLs* into the project that will address communication protocols so that all requirements related to directives will be comprehensively addressed under the single *Project 2007-02 – Operating Personnel Communication Protocols*. Do you agree with moving the requirements from IRO-013 into Project 2007-02? If not, please explain.

Yes

No

Comments:

4. The drafting team is proposing that all standards and conforming changes become effective the first day of the first quarter, three months after regulatory approvals. Do you agree that the proposed effective date will give entities time to become fully compliant? If not, please explain.

Yes

No

Comments:

5. The drafting team added a Violation Risk Factor for each requirement.

Do you agree with the Violation Risk Factor for each requirement in the proposed standards? If not, please identify any requirement with a violation risk factor you feel is incorrect.

I agree with the proposed Violation Risk Factors

I do not agree with the following Violation Risk Factors:

Comments:

(i) We agree with the VRFs for IRO-008 and -010.

(ii) For IRO-007, the VRF for R1 should be HIGH. Real-time monitoring of system conditions to determine if system parameters are within IROLs is critical to ensuring interconnected system reliability. Lack of or insufficient monitoring would expose a system to potential unreliable operation.

(iii) For IRO-009, the VRFs for R1 and R2 should both be HIGH. The absence of pre-determined control actions that need to be made available to operation personnel to prevent and mitigate IROL violation can result in failure to maintain interconnected system reliability. Operating personnel may be faced with having insufficient or no control actions to correct an IROL violation, which can lead to cascade tripping or instability. We believe this comment is consistent with our interpretation of the HIGH risk factor requirement definition (b), above.

6. The drafting team added a Mitigation Time Horizon for each requirement.

Do you agree with the Mitigation Time Horizon for each requirement in the proposed standards? If not, please identify any requirement with a time horizon you feel is incorrect.

I agree with the proposed Mitigation Time Horizons

I do not agree with the following Mitigation Time Horizons:

Comments:

(i) We agree with the mitigation time horizons for IRO-007, -008 and -010.

(ii) For IRO-009, however, R1 and R2 should also be assigned a Same Day Operation time horizon since "identified in advance of real time" may include day at hand assessments.

7. The latest version of the Reliability Standards Development Procedure requires that each standard include "violation severity levels" rather than "levels of non-compliance." "Violation severity levels" identify how badly an entity violated each requirement, and are not linked to the reliability-related impact of violating a requirement. (The reliability-related impact of violating a requirement is now identified in the "Violation Risk Factor" appended to each requirement.) Note that these severity levels are "guidelines" and variations from the above categories are acceptable.

Do you agree with the violation severity levels for each of the proposed standards? If you disagree with any of the violation severity levels for the proposed standards, please identify the standard and requirement you feel has an incorrect violation severity level.

I agree with the violation severity levels

I do not agree with the following violation severity levels:

Comments:

(i) We agree with the violation severity levels for IRO-007 and -008.

(ii) For IRO-009, the violation level is subject to interpretation. For example, "Between 95% to 99% of the IROLs identified in advance of real-time have Operating Processes, Procedures, or Plans that identify actions to prevent or mitigate instances of exceeding those IROLs." Does the 95% to 99% range apply to the number of IROLs identified, or to the total time that any IROLs are identified? In other words, is it the percentage of time that for all IROLs identified, there are Operating Processes, Procedures, or Plans that identify actions to prevent or mitigate instances of exceeding any IROLs?

To put the violation severity level in a more proper context, the SDT may want to consider putting the range in a "negative sense", i.e., the percentage of time that the requirements are not met, whichever the base of the above interpreted measurements turn out to be.

Better still, we suggest the SDT consider adopting violation severity levels based on the number of times that R1 or R2 is not met, i.e. the number of times that, for any IROLs that are identified in advance of real-time, there lacks operating processes, procedures, or plans that identify actions to prevent or mitigate instances of exceeding these IROLs. This way, assessment of violations can be made much more easily. Further, the severity level will be independent of the total number of IROLs identified, which can eliminate the skewed assessment due to a small of number of IROLs identified in an RC area. For example, under the as written % assessment structure, an RC could be found 0% compliant (and hence assessed a severe violation level) for just one incident of not meeting R1 or R2 if it had only one IROL identified.

(iii) For IRO-010, we agree with the measures as they are based on numbers, not a combination of number and duration. However, the same comment on "negative context" as provided for IRO-009 also apply here. In other words, we suggest turning the % meeting requirements to % failing to meet requirements (hence violation).

8. The implementation plan modifies several requirements in already approved standards because compliance with those requirements does not seem practical. Every facility in the Transmission Operator's area has a System Operating Limit, but the Reliability Coordinator isn't required to see all these limits and may not have information to determine the cause of instances of exceeding these limits — yet there are requirements that hold the Reliability Coordinator accountable for identifying the cause of any actual or potential SOL. The drafting team reviewed these requirements and made proposed modifications to limit the Reliability Coordinator's accountability for real-time actions relative to SOLs. Do you agree with the drafting team's approach?

I agree the drafting team's approach

I do not agree with the drafting team's approach

Comments: There are a number of requirements in the posted IRO-005-3 that still hold the RC responsible for being aware of and directing actions when a SOL is being approached or violated. The drafting team's proposed approach would require that corresponding changes be made to IRO-005-3. On the other hand, we feel that while the RC is not required to monitor these SOLs, they need to continue to be provided the information on the results of SOL determination and assessment as currently stipulated

Comment Form — IROL Standards

in R11 of TOP-002-2 since SOLs may become IROLs under certain conditions as determined by the RC.

9. The drafting team is recommending that when IRO-007-1 is approved, conforming changes be made to the following standards:

- IRO-002-1 — RC – Facilities; Retire R6
- IRO-003-2 — RC – Wide Area View; Retire R1 and R2
- IRO-005-2 — RC – Current Day Operations; Retire R1; Convert R1.1 into a Reference; Modify R13 part 2
- TOP-006-1 — Monitoring System Conditions Voltage and Reactive Control; Modify R2

Do you agree with these proposed conforming changes? If not, please identify any conforming change you feel is incorrect.

I agree with the proposed conforming changes

I do not agree with the following conforming changes:

Comments:

10. The Drafting Team is recommending that when IRO-008-1 is approved, conforming changes be made to the following standard:

- IRO-004-1 — RC – Operations Planning; Retire R1 and R2

Do you agree with these proposed conforming changes? If not, please identify any conforming change you feel is incorrect.

I agree with the proposed conforming changes

I do not agree with the following conforming changes:

Comments:

11. The Drafting Team is recommending that when IRO-009-1 is approved, conforming changes be made to the following standards:

- EOP-001-0 — Emergency Operations Planning; Retire R2
- IRO-004-1 — RC – Operations Planning; Retire R3 and R6
- IRO-005-2 — RC – Current Day Operations; Retire R3, R5, R9; Delete R13 part 1; Modify R14; Retire R16, R17

Do you agree with these proposed conforming changes? If not, please identify any conforming change you feel is incorrect.

I agree with the proposed conforming changes

I do not agree with the following conforming changes:

Comments:

(j) EOP-001 R2 requires that a TOP have an emergency load reduction plan for all identified IROLs. The intent of this requirement is for the TOP to be ready to implement load reduction as directed by the RC to mitigate IROL violations when other control actions have been implemented or are being implemented in parallel. Unless this

requirement is covered elsewhere, it needs to be retained to assure a TOP's readiness, which is in a different context than what the requirements in IRO-009 imply. Note that the RC does not own or operate any load reduction scheme. It must rely on the operators of these schemes - the TOP (and DP, as directed by the TOP), to implement load reduction.

(ii) We agree with retiring R6 of IRO-004-1, but suggest that a part of R3 in IRO-004-1 which requires that the RC develop the action plans in conjunction with the TOPs be reflected in this standard. This should be a requirement, not just an understanding, and hence needs to be stated explicitly herein.

(iii) We agree that R3, R5 and R9 of IRO-005-2 can be retired. However, the key requirement in R3 and R5 for the RC to correct an IROL violation as soon as possible and within 30 minutes needs to be retained somewhere, preferably in this standard. Not having a time limit to correct IROL violations can result in an IROL being exceeded for an indefinite period of time, subjecting the system to prolonged risks of instability and cascade tripping. The 30 minute also serves as the threshold for curtailing firm load to correct the violation immediately if an IROL violation cannot be corrected by adjusting generation and interchange, reconfiguration, reducing interruptible load, voltage reduction, etc. within that time frame.

(iv) Similar to our comment on IRO-004-1, that part in R9 of IRO-005-2 which requires the RC to coordinate transmission and generation outages needs to be stipulated somewhere, perhaps in the context of the RC approving outages. Hence, retiring R9 should be condition on halaving this coordination/approval requirement covered by this (IRO-009) or another standard.

(v) We agree that part 1 of R13, and R16 and R17 of IRO-005-2 can be deleted.

12. The drafting team is recommending that when IRO-010-1 is approved, conforming changes be made to the following standards:

- IRO-002-1 — RC – Facilities; Retire R2
- IRO-004-1 — RC – Operations Planning; Retire R4, R5
- IRO-005-2 — RC – Current Day Operations; Retire R2
- TOP-003-0 — Planned Outage Coordination; Modify R1.2
- TOP-005-1 — Operational Reliability Information; Retire R1, R1.1; Convert Attachment A to a Reference
- TOP-006-1 — Monitoring System Conditions Voltage and Reactive Control; Modify R4

Do you agree with these proposed conforming changes? If not, please identify any conforming change you feel is incorrect.

I agree with the proposed conforming changes

I do not agree with the following conforming changes:

Comments:

(i) We agree with retiring R2 of IRO-002-1.

(ii) We agree with retiring R4 and R5 of IRO-004-1. However, the time frame for the RC to complete day-ahead assessment as stipulated in R5 should be retained somewhere as otherwise, there could be mis-coordination, delays and even failure to complete the assessment in time for other operating entities to prepare the system for next day operations.

Comment Form — IROL Standards

(iii) We do not agree with removing R1.2 from TOP-003-1. Providing transmission outage information to the RC is essential for ensuring the RC is aware of system changes that may affect interconnected system reliability. There should not be any prejudgment as to which outage has an impact on SOL only.

(iv) We agree with the proposed deletions/changes to IRO-005-2, TOP-005-1 and TOP-006-1.

13. If you are aware of any conflicts between the proposed standard and any regulatory function, rule order, tariff, rate schedule, legislative requirement or agreement please identify the conflict here. Similarly, if you believe that any requirement in this set of standards has an unnecessary adverse impact on energy markets, please identify the requirement and its adverse impact here.

No known conflicts or unnecessary adverse impacts

Known conflict:

Unnecessary adverse impact on markets:

14. The drafting team is recommending that these standards be balloted with **four separate ballots**, according to the following table. There would be a single ballot for IRO-007-1 that would include approval of IRO-007-1 and approval of the retirement of IRO-002-1 R6, and approval of retirement of IRO-003-2 R1 and R2, etc.

Ballot for:	Includes Associated Changes to Already Approved Standards:
IRO-007	IRO-002-1 — RC – Facilities - Retire R6 IRO-003-2 — RC – Wide Area View - Retire R1 and R2 IRO-005-2 — RC – Current Day Operations - Retire R1; Convert R1.1 into a Reference; Modify R13 part 2 TOP-006-1 — Monitoring System Conditions Voltage and Reactive Control - Modify R2
IRO-008	IRO-004-1 — RC – Operations Planning - Retire R1 and R2
IRO-009	EOP-001-0 — Emergency Operations Planning - Retire R2
	IRO-004-1 — RC – Operations Planning - Retire R3 and R6
	IRO-005-2 — RC – Current Day Operations Retire R3, R5, R9; Delete R13 part 1; Modify R14; Retire R16, R17
IRO-010	IRO-002-1 — RC – Facilities - Retire R2
	IRO-004-1 — RC – Operations Planning - Retire R4, R5

Comment Form — IROL Standards

	IRO-005-2 — RC – Current Day Operations - Retire R2
	TOP-003-0 — Planned Outage Coordination Modify R1.2
	TOP-005-1 — Operational Reliability Information - Retire R1, R1.1; Convert Attachment A to a Reference
	TOP-006-1 — Monitoring System Conditions Voltage and Reactive Control - Modify R4

I agree with balloting these standards using four separate ballots

I do not agree balloting these standards using four separate ballots:

Comments:

15. If you have any other comments on this set of standards or its implementation plan that you have not already submitted above, please provide them here.

No additional comments

Comments:

(i) The requirement to monitor, or at least be aware of the impacts on, critical parameters in other RC's areas, as proposed for IRO-007 (M2.1) and IRO-008 (R1) in the previous draft set of standards posted on March 1, 2004, is missing. This monitoring capability is essential for identifying potential reliability impact on other RC areas due to operation plans and real-time operations in one RC area. Note that IRO-010 has this requirement (implicit in R3).

(ii) R2 of IRO-008 requires that Real-Time Assessments be performed at least every 30 minutes. The definition of Real-Time Assessment leaves open how far into the future the assessments must cover. Please clarify.

Using the current definition for Real-Time Assessments, R2 of IRO-008 would require that a complete study for the remainder of the operating day be performed at least every 30 minutes.

We believe it is more appropriate to consider Real-Time Assessment to mean the use of real-time information to assess system conditions for the current minute up to a certain time period, say, next hour. Operations Planning Analysis, which includes day at hand, should cover the remaining hours for the current day and beyond, up to about a year. We suggest the SDT consider revising the definitions in this manner to add clarity to R2 (and R1 as well) of IRO-008.

(iii) R3 of IRO-008 requires sharing of results to prevent or mitigate exceeding an IROL. We feel that this should also require an RC to direct taking necessary actions to prepare for correcting the situation. We therefore suggest that "and direct as deemed necessary" be inserted after "...the Reliability Coordinator shall share its results with" in R3.

(iv) Two new terms are defined in IRO-009: Interconnection Reliability Operating Limit Event and Interconnection Reliability Operating Limit Event Duration. Neither are used in this standard; so what is the reason for having these terms defined?

(v) In IRO-009, Violation Severity Levels, Section 2.3.2 establishes a high violation severity if an IROL was actually exceeded and there was a delay before taking action.

The term "delay" is not defined. This leaves this term open for interpretation and will result in inconsistent enforcement. The standard needs to define what is meant by delay.

(vi) In the previous draft standard IRO-009, there was a requirement (R1.4) for the RC to document and complete an IROL violation report for each instance of exceeding an IROL for time greater than that limit's Tv. This requirement is currently stipulated in EOP-004, with cross reference to TOP-007. We feel it's more appropriate for the RC to make this report and hence this requirement should be added to IRO-009.

(vii) We do not have any comments on the proposed measures. However, from a process viewpoint, none of the questions asked in this comment form seek concurrence or comments on any of the measures proposed. Since these measures did not exist in any of the current standards, and have been revised since the last draft versions (posted on March 1, 2004), the industry needs to have an opportunity to offer its view.