

Comment Form for 3rd Posting of Operate within Interconnection Reliability Operating Limits Standard

Note – This form is to comment on version 3 of the Monitor and Assess Short-term Transmission Reliability – Operate Within Transmission Limits Standard (now called ‘Operate Within Interconnection Reliability Operating Limits’.)

The latest version of this Standard (OPER_WITHN_LMTS_05_03) is posted on the Standards website at: <http://www.nerc.com/~filez/standards/Monitor-Assess.html>

E-mail this form between March 1–April 14, 2004, to: sarcomm@nerc.com with “Comments” in the subject line.

If you have any questions about this Standards draft comment form, please contact Gerry Cauley, the Director-Standards at 609-452-8060 or Gerry.Cauley@nerc.net

Major Changes Requested to this Standard:

The Standards Drafting Team made several changes to this standard, based on the comments submitted during the first ballot of this standard. You can see the Standards Drafting Team’s consideration of every comment submitted with a ballot at:

<http://www.nerc.com/~filez/standards/Monitor-Assess.html>

The SDT’s most significant changes include the following:

- Clarified the definitions of ‘widespread impact,’ ‘cascading outages’ and ‘bulk electric system’ so they are measurable.
- Modified the definition of T_v to align its definition with interconnection risk rather than sanctions and to indicate that T_v can’t exceed 30 minutes.
- Modified Requirement 201 for IROL Identification to better reflect the dynamic nature of IROLs
- Modified Requirement 201 to add language to ensure that RAs that share a Facility (or group of Facilities) have an agreed upon process for determining if the Facility is subject to IROLs and for developing the IROL and its T_v
- Modified Requirement 204 for RA Actions to indicate that the RA must act ‘without delay’ to prevent or mitigate instances of exceeding IROLs
- Modified the sanction associated with operating outside an IROL for time greater than T_v to make the sanction proportional to both the magnitude and the duration of the incident.

Changes outside the Scope of the SDT:

Several Balloters asked the SDT to make some changes that are outside the scope of the SDT.

These changes include the following:

- Wait until the Functional Model is modified, re-approved and/or better understood
- Wait until related Standards are approved
- Wait until Field Testing is conducted
- Expand the scope to include operating outside all System Operating Limits — not just those that could cause instability, cascading outages or uncontrolled separation

Wait for the Functional Model

The SDT cannot guarantee that the Functional Model will never change. However, the SDT can state that the Functional Model is the approved basis for writing the current standards. NERC’s current Policies and Standards were based upon the concept of a control area. Recent events (such as the creation of GENCOs, TRANSCO and generation-only control areas) have shown that NERC’s vision of control area is no longer a valid basis for writing standards. The task-based Functional Model is the approved alternative.

The Functional Model defines tasks and relationships. To date the Functional Model’s tasks and relationships remain virtually the same as they were in the original version. The addition of

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separating the tasks between owner and operator did not invalidate the Functional Model. Neither did the inclusion of the Planning Functions invalidate the Functional Model. If new subdivisions of tasks are required, then the standards will have to be amended appropriately. However, to wait until everyone can agree on the future of our industry would commit NERC to permanent inaction.

Wait for Related Standards

These new standards are not 'stand-alone' — there are many inter-dependencies between these standards. It is not practical to 'wait' for one standard to be completed before finalizing another standard. Because we are developing these standards in parallel, rather than in series, the Standard Drafting Teams don't have control over the completion of any other standard. The NERC BOT directed the teams to proceed with development of standards without delay — and that is what the drafting teams are trying to do. If NERC had more time to develop a new set of standards, then it would be better to develop the standards 'one at a time' — but the industry has an urgent need for a new set of standards to be in place as soon as possible.

Wait for Field Testing

The Director-Compliance is responsible for working with the Standards Authorization Committee in determine if there is a need to conduct field-testing of a standard. In this case, the Director-Standards recommended against field-testing, and this recommendation was supported by the Standards Authorization Committee. The decision to conduct field-testing is not within the scope of the SDT.

Expand the scope to include all System Operating Limits (SOLs)

The scope of this standard was limited to the subset of SOLs that are IROLs. The SDT recognizes that exceeding **any** SOL is unacceptable, but adding requirements to this standard that address exceeding SOLs is outside the scope of the associated SAR. The SDT is drafting another SAR to address monitoring and operating within SOLs.

SDT Assumptions about the RA's monitoring and directing actions to prevent exceeding an IROL

The SDT developed this standard with an assumption that entities would act honorably and with integrity. This standard requires that IROLs have both a magnitude and a duration component (T_v). The SDT assumes that RAs following this standard will not exceed any IROL for any 'emerging condition'. RAs should be constantly monitoring their RA Area and should take pre-emptive actions to prevent ever exceeding an IROL. Emerging situations should never result in an instance of exceeding an IROL. However, if a plane hits a set of transmission lines, an IROL may be exceeded and actions need to be taken without delay. For the unusual situation such as the plane crash, an IROL may be exceeded but not for a time greater than its T_v .

Levels of Non-compliance

Several balloters asked that additional levels of non-compliance be added to the standard. Where this seemed reasonable, additional levels were added. The table on the following pages provides a comparison of the levels of non-compliance for all the requirements in this standard, with the SDT's reasoning for the assignments.

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Requirements	First Offense	Second Offense	Reasoning
1. IROL Identification			
(Level1) No process for addressing 'shared' Facilities	Letter to VP	Letter to VP	Shared facilities require cooperation between RAs. Not documenting a process for addressing these shared facilities is not as bad as not having any evidence that the RAs have agreed on which Facilities are subject to IROLs. Not having 'joint' agreement on which shared Facilities are subject to IROLs is a less severe infraction than not having a list of Facilities subject to IROLs for the RA's own Reliability Area.
(Level 2) No evidence that the RAs with a shared Facility have agreed on whether that Facility is subject to an IROL	Letter to VP	Letter to CEO \$1,000	
(Level 3) One or more IROLs had a T _v greater than 30 minutes	Letter to CEO \$1,000 fine	Letter to CEO \$2,000 fine	Having a T _v greater than 30 minutes may pose an unacceptable risk to the interconnection.
(Level 3) List of Facilities subject to IROLs not updated	Letter to CEO \$1,000 fine	Letter to CEO \$2,000 fine	The System Operators need to know this information – having an out of date list is not good, but it is better than not having any of the data
(Level 4) No list of facilities subject to IROLs	Letter to CEO \$2,000	Letter to CEO \$4,000	The System Operators need this information – without knowing what facilities are subject to IROLs, the System Operators may allow a limit to be exceeded for so long that it causes a cascading outage . . .
(Level 4) Unable to produce current IROLs	Letter to CEO \$2,000	Letter to CEO \$4,000	
2. Monitoring			
(Level 2) List of Facilities subject to IROLs not available for Real-time use	Letter to VP	Letter to CEO \$1,000	This information is needed for situational awareness. If operations personnel are aware of the facilities subject to IROLs they will pay closer attention to these facilities. However, not having this information is not as bad as not having current IROLs for real-time use.
(Level 4) IROLs not available to system operators for real time use	Letter to CEO \$2,000	Letter to CEO \$4,000	System Operators need to constantly monitor real time data and compare this against IROLs. If this isn't done, then there is a risk that a critical limit will be approached or exceeded and the system operator won't be aware of the condition – if left unknown, the limit could cause a cascading outage, . . .
(Level 4) Real-time data can't be compared to IROLs	Letter to CEO \$2,000	Letter to CEO \$4,000	
(Level 4) System Operators not monitoring real-time data against IROLs	Letter to CEO \$2,000	Letter to CEO \$4,000	

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3. Analyses and Assessments			
(Level 3) Can't show that an operational planning analysis was done once/day	Letter to CEO \$1,000 fine	Letter to CEO \$2,000 fine	Conducting the analyses and assessments is critical to identifying conditions that exist or may exist in the near future. If some analyses were 'skipped', this is not acceptable — the entity was 'lucky' and the sanction is a warning.
(Level 3) Can't show that a real-time assessment was done every 30 minutes	Letter to CEO \$1,000 fine	Letter to CEO \$2,000 fine	
(Level 4) Didn't do an operational planning analysis or a real-time assessment well enough to know if there are any actual or potential instances of exceeding an IROL.	Letter to CEO \$2,000	Letter to CEO \$4,000	Analyses and assessments need to result in the system operator KNOWING whether there is an actual or potential problem — if the analyses and assessments don't result in the system operator KNOWING whether there is an actual or potential problem, then this is the same as not having done the analysis or assessment.
4. Actions			
(Level 1) IROL exceeded for a time less than or equal to T_v and no documentation to indicate actions taken or directives issued to mitigate the instance.	Letter to VP	Letter to VP	All instances of exceeding an IROL are serious. The Compliance Monitor needs to use the RA's documentation as a reference in auditing other entities to verify that the RA's Directives have been followed. Data relative to IROLs must be collected so that it is available for reliability studies.
(Level 4) Exceeded an IROL's magnitude and duration components.	Letter to CEO Variable \$\$ fine	Letter to CEO Variable \$\$ fine	This is the worst possible violation in this standard — and carries the harshest sanction. If an IROL is exceeded, then the interconnection has been placed in an unacceptable risk.

5. Data Specification			
(Level 1) Specification incomplete	Letter to CEO	Letter to CEO	<p>The data specification needs to be complete. Most entities already exchange data, and some entities may not have a 'complete' data specification. A lower level sanction recognizes that some data that is supplied may not be documented on a specification, and there may need to be some 'warnings' to motivate the RA to improve its documentation.</p> <p>The RA is strongly motivated to perform well and is required to meet stringent certification requirements so the RA will most certainly request the data it needs.</p>
(Level 2) Specification not distributed	Letter to VP	Letter to CEO \$1,000	<p>The data specification needs to be distributed so other entities can provide the needed data. Most entities already exchange data, and some entities may not have a 'complete' data specification. A lower level sanction was applied in recognition that some entities may already be exchanging data without a documented data specification, and there may need to be some 'warnings' to motivate the RA to improve its documentation.</p>
6. Data Provision			
(Level 4) Data not provided as specified and situation not resolved	Letter to CEO \$2,000	Letter to CEO \$4,000	<p>If data is needed and specified in a written document, then it does need to be provided. Not providing data that has been formally requested is serious because it can jeopardize the RA's ability to accurately monitor and assess its Reliability Area. In most cases, the Compliance Monitor only finds out about this violation if the RA tries to resolve the discrepancy, but the RA is unable to obtain the data it needs.</p>

7. Procedures, Processes or Plans for Preventing and Mitigating Instances of Exceeding IROLs			
(Level 1) Exist but not coordinated with all with all other RAs	Letter to VP	Letter to VP	If an entity has a document, then that entity has gone through the process of determining appropriate actions and has provided the document to its system operators for real time use. If the document isn't coordinated with other entities that need to act as part of that document, then there needs to be some sanction to motivate the involved entities to 'sign on the dotted line'. Without some formal agreement between all involved entities, there is no assurance that everyone involved will act as needed without unnecessary delays. These sanctions recognize that involving some of the other entities that need to act as part of the 'plan' is not as unacceptable as not involving any of the other entities that need to act as part of the 'plan'.
(Level 2) Exist but not coordinated with any other RAs	Letter to VP	Letter to CEO \$1,000	
(Level 3) Documents exist but don't address both preventing and mitigating IROLs	Letter to CEO \$1,000 fine	Letter to CEO \$2,000 fine	These sanctions recognize that having some documents is better than having no documents — but every RA should have documents that can be followed so that the RA's staff will be prepared.
(Level 4) Documents do not exist	Letter to CEO \$2,000	Letter to CEO \$4,000	
8. RA Directives			
(Level 1) Documentation incomplete	Letter to VP	Letter to VP	All operations involving IROLs are serious. The Compliance Monitor needs to review the documentation in concert with the RA's documentation for the same incident, to verify that the RA's Directives have been followed.
(Level 4) Didn't follow directives	Letter to CEO \$2,000	Letter to CEO \$4,000	This is an extremely serious violation since not following the RA's directives can jeopardize the reliability of the interconnection.

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STD Commenter Information (For Individual Commenters)
Name
Organization
Industry Segment #
Telephone
E-mail

Key to Industry Segment #'s: 1 – Trans. Owners 2 – RTO's, ISO's, RRC's 3 – LSE's 4 – TDU's 5 - Generators 6 - Brokers, Aggregators, and Marketers 7 - Large Electricity End Users 8 - Small Electricity Users 9 - Federal, State, and Provincial Regulatory or other Govt. Entities

STD Commenter Information (For Groups Submitting Group Comments)		
Name of Group: Standards Review Committee for the IRC	Group Chair: Karl Tammar Chair Phone: 518-356-6205 Chair Email: ktammar@nyiso.com	
List of Group Participants that Support These Comments:		
Name	Company	Industry Segment #
Dale McMaster	AESO	2
Ed Riley	CAISO	2
Sam Jones	ERCOT	2
Don Tench	IMO	2
Dave LaPlante	ISO_NE	2
William Phillips	MISO	2
Karl Tammar	NYISO	2
Bruce Balmat	PJM	2
Carl Monroe	SPP	2

Questions about Definitions

1. The SDT revised the definition of Bulk Electric System to clarify what portion of the electric system was included. Do you agree with the revised definition?

Bulk Electric System: A term commonly applied to the portion of an electric utility system that encompasses the electrical generation resources and high voltage transmission system (above 35 kV or as approved in a tariff filed with FERC).

Yes No

Comments: Please drop the parenthetical expression – we would ask NERC and the industry to develop “standard” definitions of the common terms to be used by the all standard drafting teams.

2. Several balloters indicated that they didn’t know if a studied event would meet the old definition of a cascading outage. The SDT adopted criteria currently used by the Department of Energy as the threshold for disturbance reporting. DOE uses, “Uncontrolled loss of 300 MW or more of firm system loads for more than 15 minutes from a single incident” as one of its thresholds for reporting disturbances.

If a study shows that exceeding an SOL will result in the uncontrolled successive loss of 300 MW or more of networked system load for 15 minutes or more — then that SOL is considered an IROL. Do you agree with the revised definition?

Cascading Outages: The uncontrolled successive loss of system elements triggered by an incident at any location that results in the loss of 300 MW or more of networked system load for a minimum of 15 minutes.

Yes No

Comments: The definition should read as follows: The uncontrolled successive loss of Bulk Power Transmission elements that propagate beyond a balancing area's boundaries.

3. Several balloters indicated a preference for a definition of T_v that referenced a link to risk rather than a link to a sanction. Most balloters indicated a preference for an upper limit to T_v . Do you agree with the revised definition?

T_v : The maximum time that an Interconnection Reliability Operating Limit can be exceeded before the risk to the interconnection becomes greater than acceptable. T_v may not be greater than 30 minutes.

Yes No

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4. Several balloters indicated a continued misunderstanding of the difference between 'wide area impact' and 'local area'. The SDT modified the definition in an attempt to make the definition more objective. The Department of Energy currently requires that any single incident involving the uncontrolled loss of 300 MW or more of firm system loads be reported on form DOE EIA 417. The SDT adopted this criterion as the threshold for determining whether the impact of an event was 'widespread'. (Note that while the term, 'wide area impact' is not used in this standard, it is used in the definition of an IROL.) Do you agree with the revised definition for Wide Area Impact?

Wide Area Impact: The impact of a single incident resulting in the uncontrolled loss of 300 MW or more of networked system load for a minimum of 15 minutes.

Yes No

Comments: **Wide Area Impact should be defined in relation to a BA or RA footprint. The measure should be that a wide area event occurs when an event has an impact in two or more BA or RA areas.**

5. Several other definitions had minor changes. Please identify any definitions you feel need to be revised, and if possible suggest a revision.

Yes No

Comments: **A definition of "shared facilities" is requested.**

Questions about Requirement 201 — IROL Identification

6. Do you agree with the following new measure developed to support the requirement that addresses the handling of 'shared' Facilities?

The Reliability Authorities that share a Facility (or group of Facilities) shall have an agreed upon process for determining if that Facility (or group of Facilities) is subject to an Interconnection Reliability Operating Limit and for determining the value of that Interconnection Reliability Operating Limit and its associated T_v

Yes No

Comments: **The wording should be clarified to only include those facilities that are subject to IROLs.**

Questions about Requirement 201 — IROL Identification, continued

7. Several balloters asked that the SDT to change this requirement to better reflect that IROLs can be dynamic. The SDT modified the requirement so that instead of requiring a 'list' of IROLs, the RA must be able to identify the 'current value' of its IROLs. Do you agree with this change?

Yes No

Comments

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8. Do you agree with the compliance monitoring process?

- Yes No
 Comments

9. Do you agree with the levels of non-compliance?

- Yes No
 Comments: **There was no group consensus – financial penalties are an issue for some group members.**

10. Several balloters indicated a concern over coordination of IROLs between RAs. Do you think the standard should include a requirement that the RA obtain agreement from its adjacent RAs on which Facilities in the combined RA Areas are subject to IROLs?

- Yes No
 Comments

11. Several balloters requested that the SDT change the standard to include a requirement that RAs publicly post their IROLs. The SDT could not identify a reliability-related reason to support this. Do you want the standard to require public posting of IROLs?

- Yes No
 Comments: **What does “made public” mean? All RAs should be aware of all IROLs but this information may not be appropriate for the “general public”. There is a concern over infrastructure security and some concern voiced by a CIPC member.**

12. Other comments about Requirement 201: **None**

Questions about Requirement 202 — Monitoring

13. Several balloters recommended the following addition to this requirement. Do you agree with this addition?

- (i) The RA shall provide the following information to its system operators:
- (a) The system conditions under which the Interconnection Reliability Operating Limit applies,
 - (b) The contingency that is the basis for the limit,
 - (c) The impact of exceeding the limit

- Yes No
 Comments

Questions about Requirement 204 — Actions

14. Several balloters commented about the level of documentation required in this standard. The SDT noted that without additional clarification, the entity that receives an RA's directive may not realize that the directive is related to an IROL. To improve the 'situational awareness' of directives related to IROLs, the SDT added this requirement. Do you agree with the addition of this requirement?

Each directive issued relative to an IROL shall include a statement to inform the recipient that the directive is related to an IROL

- Yes No
 Comments: **All directives issued by an RA must be followed without question, no matter what the circumstances. The explanations can be provided after actions have been taken and the problem solved.**

15. Some balloters suggested that the SDT modify the criteria for determining the duration of an IROL event. The language currently in the standard is shown below. One balloter suggested that the '30 seconds' be modified to '1 minute' – another balloter suggested that a longer duration should be required and suggested 10 minutes. The 30 seconds was intended to represent the maximum duration associated with a 'bad telemetry scan.'

The duration of the event shall be measured from the point when the limit is exceeded to the point when the system has returned to a state that is within the Interconnection Reliability Operating Limit for a minimum of 30 seconds.

- Keep the minimum of 30 seconds
 Change the minimum to 1 minute
 Change the minimum to 10 minutes
 Comments: **The SRC would like to see a value remain below its limit for two minutes with the understanding that if the value remains below the limit for two minutes, the reported end of the event or violation occurs at the time the value actually dropped below the limit.**

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12. Several balloters requested that the sanction for exceeding an IROL for time greater than the IROL's T_v be modified so that the sanction is proportional to both the magnitude and the duration of the event. The SDT modified the sanction so that it would be the greater of the fixed dollar sanction listed in the matrix, or the dollar amount that corresponds to the magnitude and duration of the event as highlighted in the following table.

Do you agree with this table?

- Yes
 No
 Comments: **The group did not reach consensus.**

If the Maximum Value % over the Limit (measured after the event duration exceeds T_v) is: Max Value % = (Max Value/ IROL limit -1)*100	And the event duration exceeds its T_v by ___ minutes:	Then Multiply the Level 4 \$ sanction by:
$0\% < \text{Max Value \%} \leq 5\%$	$T_v < \text{Duration} \leq T_v + 5 \text{ minutes}$	5
	$T_v + 5 \text{ minutes} < \text{Duration} \leq T_v + 10 \text{ minutes}$	10
	$T_v + 10 \text{ minutes} < \text{Duration} \leq T_v + 15 \text{ minutes}$	15
	$\text{Duration} > T_v + 15 \text{ minutes}$	20
$5\% < \text{Max Value \%} \leq 10\%$	$T_v < \text{Duration} \leq T_v + 5 \text{ minutes}$	10
	$T_v + 5 \text{ minutes} < \text{Duration} \leq T_v + 10 \text{ minutes}$	15
	$T_v + 10 \text{ minutes} < \text{Duration} \leq T_v + 15 \text{ minutes}$	20
	$\text{Duration} > T_v + 15 \text{ minutes}$	25
$10\% < \text{Max Value \%} \leq 15\%$	$T_v < \text{Duration} \leq T_v + 5 \text{ minutes}$	15
	$T_v + 5 \text{ minutes} < \text{Duration} \leq T_v + 10 \text{ minutes}$	20
	$T_v + 10 \text{ minutes} < \text{Duration} \leq T_v + 15 \text{ minutes}$	25
	$\text{Duration} > T_v + 15 \text{ minutes}$	30
$15\% < \text{Max Value \%} \leq 20\%$	$T_v < \text{Duration} \leq T_v + 5 \text{ minutes}$	20
	$T_v + 5 \text{ minutes} < \text{Duration} \leq T_v + 10 \text{ minutes}$	25
	$T_v + 10 \text{ minutes} < \text{Duration} \leq T_v + 15 \text{ minutes}$	30
	$\text{Duration} > T_v + 15 \text{ minutes}$	35
$20\% < \text{Max Value \%} \leq 25\%$	$T_v < \text{Duration} \leq T_v + 5 \text{ minutes}$	25
	$T_v + 5 \text{ minutes} < \text{Duration} \leq T_v + 10 \text{ minutes}$	30
	$T_v + 10 \text{ minutes} < \text{Duration} \leq T_v + 15 \text{ minutes}$	35
	$\text{Duration} > T_v + 15 \text{ minutes}$	40
$25\% < \text{Max Value \%} \leq 30\%$	$T_v < \text{Duration} \leq T_v + 5 \text{ minutes}$	30
	$T_v + 5 \text{ minutes} < \text{Duration} \leq T_v + 10 \text{ minutes}$	35
	$T_v + 10 \text{ minutes} < \text{Duration} \leq T_v + 15 \text{ minutes}$	40
	$\text{Duration} > T_v + 15 \text{ minutes}$	45

Questions about Requirement 207 — Processes, Procedures or Plans for Preventing and Mitigating IROLs

16. Several balloters asked for more clarification on the term 'action plan' that was used in the last version of this standard. Several other drafting teams have used the terms, 'processes, procedures or plans' to clarify that the document required may be general in nature or very specific, as long as the document addresses the required topic. In response, the SDT changed the phrase, 'action plan' to 'processes, procedures or plans' throughout this requirement. Do you agree with this change?

- Yes No
 Comments

Other Questions about this Standard: We are all members of the ballot pool and intend to vote individually. There was no discussion of the remaining questions as a group response seemed inappropriate.

17. Are you a member of the Ballot Pool (or do you represent a member of the Ballot Pool) for this standard?

- Yes, I am a member of the Ballot Pool, or I represent a member of the Ballot Pool for this standard
 No, I am not a member of the Ballot Pool for this standard
 Comments

18. If you are a member of the Ballot Pool (or if you represent a member of the Ballot Pool), do you agree with the technical content of this standard? Note that the technical content of the standard consists **solely** of the individual Requirements and their associated Measures — the Compliance Monitoring Process, Levels of Non-compliance and Sanctions are **not** considered part of the 'technical content' of the standard.

- I am a member of the Ballot Pool or I represent a member of the Ballot Pool and **I do agree** with the Technical Content of this standard.
 I am a member of the Ballot Pool or I represent a member of the Ballot Pool and **I do not agree** with the Technical Content of this standard.
 I am not a member of the Ballot Pool nor do I represent a member of the Ballot Pool for this standard. **I do agree** with the Technical Content of this standard.
 I am not a member of the Ballot Pool nor do I represent a member of the Ballot Pool for this standard. **I do not agree** with the Technical Content of this standard.
 Comments

19. If you are a member of the Ballot Pool (or if you represent a member of the Ballot Pool), will you vote on this standard based on its content (requirements, measures, compliance monitoring process and levels of non-compliance), or will you withhold your approval based on factors related to the standards process? This would include factors such as changes to the Functional Model, the removal of Financial Sanctions from the Compliance Enforcement Program, or the inclusion of Field Testing.

- I am a member of the Ballot Pool or I represent a member of the Ballot Pool and **I will vote on this standard based solely on its content**

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- I am a member of the Ballot Pool or I represent a member of the Ballot Pool and **I will vote against this standard until other standards-related issues are resolved.**
- Not applicable – I am not a member of the Ballot Pool nor do I represent a member of the Ballot Pool

20. Other Comments about this Standard: