

**Comment Form for First Posting of SAR and Standard to Modify IRO-006 as Recommended by the Interchange Distribution Calculator Working Group**

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Please use this form to submit comments on the IDCWG's first draft of the SAR and Standard for modifications to IRO-006-2. Comments must be submitted by April 3, 2006. You must submit the completed form by e-mailing it to [sarcomm@nerc.com](mailto:sarcomm@nerc.com) with the words "IRO-006 – IDCWG" in the subject line. If you have questions please contact Mark Ladrow at [mark.ladrow@nerc.net](mailto:mark.ladrow@nerc.net) or 609.452.8060.

ALL DATA ON THIS FORM WILL BE TRANSFERRED AUTOMATICALLY TO A DATABASE.

- DO: **Do** enter text only, with no formatting or styles added.  
**Do** use punctuation and capitalization as needed (except quotations).  
**Do** use more than one form if responses do not fit in the spaces provided.  
**Do** submit any formatted text or markups in a separate WORD file.

- DO NOT: **Do not** insert tabs or paragraph returns in any data field.  
**Do not** use numbering or bullets in any data field.  
**Do not** use quotation marks in any data field.  
**Do not** submit a response in an unprotected copy of this form.

Individual Commenter Information		
(Complete this page for comments from one organization or individual.)		
Name:	Ron Falsetti	
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NERC Region		Registered Ballot Body Segment
<input type="checkbox"/> ERCOT	<input type="checkbox"/>	1 – Transmission Owners
<input type="checkbox"/> FRCC	<input checked="" type="checkbox"/>	2 – RTOs, ISOs, Regional Reliability Councils
<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



## **Background Information**

The Interchange Distribution Calculator Working Group (IDCWG) is requesting a modification to the NERC Transmission Loading Relief (TLR) Procedure to clarify the wording related to the implementation of a TLR Level 4 (Section 2.5) and modifying Section 2.4 and Section 7 to provide for the Reallocation of Markets Flows and Interchange Transactions at the top of the next hour for the issuance of a TLR Level 3b. The reliability benefit is that a Reliability Coordinator will no longer be required to call a TLR Level 3a as soon as the System Operating Limit or Interconnection Reliability Operating Limit violation that caused the TLR Level 3b to be initiated has been mitigated, since the proposed revision results in a next hour Reallocation.

Because the IDCWG recommended this change be implemented as soon as practical, the Standards Authorization Committee (SAC) authorized the IDCWG to post both the SAR and the proposed standard simultaneously. Your comments below should indicate whether you accept the SAR and the Standard.

1. Do you agree with the SAR and the associated proposed revision to IRO-006 to modify the TLR procedure to clarify the wording related to the implementation of a TLR Level 4? If not, please explain why you disagree.

Yes

No

Comments: The IESO generally supports the proposed changes to modify the TLR procedure to: (a) clarify the wording related to the implementation of a TLR Level 4, and (b) provide for the reallocation at the top of the next hour for the issuance of a TLR Level 3b. However, we are unable to offer any relevant comments since we have difficulties following the standard revision process adopted for this standard change.

This draft standard, IRO-006-3, was posted on February 17, 2006. Revisions to incorporate the TLR Level 4 and 3b changes were made to a Version 2 (IRO-006-2) of this standard that was posted on January 2, 2006 for comments through February 15, 2006. In other words, at the time IRO-006-3 was posted, IRO-006-2 had just completed its commenting period but had not yet gone through pre-ballot posting, balloting and the eventual approval process. Making revisions to a yet-to-be approved version is problematic from a commenting viewpoint. For example, compared to the approved version (IRO-006-1), Version 2 (IRO-006-2) contains several major changes, including:

- a. Removal of the regional differences in Section E;
- b. Insertion of the term "market flow" in numerous places;
- c. Addition of new Sections 3.2, 5.3 (in which Section 5.3.2 stipulates the down to 3 percent threshold that has been much debated of late) and Section 8 in Attachment 1, and Section 4 with a market flow curtailment sub-priority table in Appendix E.

The majority of these changes are also included but not marked in Version 3. This might give readers the impression that the unmarked portion is from an approved version, or the proposed changes to Version 2 are assumed approved. However, a change to Section 5.3.2 from the 3 percent in Version 2 to zero percent in Version 3 has not been marked. This is very confusing.

Furthermore, in view of the public comments on Version 2, a modified Version 2 (we'll call it Version 2b) was posted on March 1, 2006 for urgent action pre-ballot review. This creates more difficulty for the IRC to provide relevant comments on Version 3 as there does not appear to be a stable base version to which changes to incorporate the modified TLR Level 4 and 3b are made. We are unable to decide whether or not to comment on the

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TLR Level 4 and 3b changes only, or the changes associated with the market flow calculation, which are still subject to change, or both.

2. Do you agree with the SAR and the associated proposed revision to IRO-006 to modify the TLR procedure to provide for the Reallocation of Markets Flows and Interchange Transactions at the top of the next hour for the issuance of a TLR Level 3b? If not, please explain why you disagree.

Yes

No

Comments: See above comments.

3. Do you agree with the Implementation Plan for IRO-006? If not, please explain why you disagree.

Yes

No

Comments: Implementation of Version 3 is critically dependent on having an approved Version 2. At this point in time, we are very confused with the base version to which revisions are made to arrive at Version 3. In view of the posting of urgent action Version 2 and its target implementation date, we have serious doubts on the June 1 Board approval date for Version 3.

We urge the SDT to review the revision process and develop a more realistic schedule for the development and implementation of this standard. We further urge the SDT to consider one of the following possible approaches:

1. Revise the urgent action Version 2, after it's been approved, to remove the regional differences and incorporate the market flow calculation changes that the previous Version 2 was intended to accomplish, and go through the proper posting and balloting process. Upon its approval, make further changes to incorporate the TLR Level 4 and 3b modifications.

2. Revise the urgent action Version 2, after it's been approved, to remove the regional differences, incorporate the market flow calculation changes and incorporate the TLR Level 4 and 3b modifications all at the same time, and post it for public comments.

We regret that we are unable to offer any comments relevant to the proposed changes at this time. However, we want to reiterate our continued strong support for standard revisions to enhance planning and operation reliability.