

**Comment Form — Proposed Reliability Coordination — Transmission Loading Relief
IRO-006-1**

This form is to be used to submit comments on the proposed Draft 1 of the Proposed Reliability Coordination- Transmission Loading Relief SAR. Comments must be submitted by **September 2, 2005**. You may submit the completed form by emailing it to: sarcomm@nerc.com with the words “Reliability Coordination- Transmission Loading Relief SAR” in the subject line. If you have questions please contact Mark Ladrow at mark.ladrow@nerc.net or by telephone at 609-452-8060.

ALL DATA ON THIS FORM WILL BE TRANSFERRED AUTOMATICALLY TO A DATABASE AND IT IS THEREFORE IMPORTANT TO ADHERE TO THE FOLLOWING REQUIREMENTS:

- 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:	Dan Rochester
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NERC Region	Registered Ballot Body Segment
<input type="checkbox"/> ERCOT	<input type="checkbox"/> 1 - Transmission Owners
<input type="checkbox"/> ECAR	<input checked="" type="checkbox"/> 2 - RTOs, ISOs, Regional Reliability Councils
<input type="checkbox"/> FRCC	<input type="checkbox"/> 3 - Load-serving Entities
<input type="checkbox"/> MAAC	<input type="checkbox"/> 4 - Transmission-dependent Utilities
<input type="checkbox"/> MAIN	<input type="checkbox"/> 5 - Electric Generators
<input type="checkbox"/> MAPP	<input type="checkbox"/> 6 - Electricity Brokers, Aggregators, and Marketers
<input checked="" type="checkbox"/> NPCC	<input type="checkbox"/> 7 - Large Electricity End Users
<input type="checkbox"/> SERC	<input type="checkbox"/> 8 - Small Electricity End Users
<input type="checkbox"/> SPP	<input type="checkbox"/> 9 - Federal, State, Provincial Regulatory or other Government Entities
<input type="checkbox"/> WECC	
<input type="checkbox"/> NA - Not Applicable	

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Background Information:

In August 2004, NERC and NAESB agreed to immediately begin a joint effort to update the Eastern Interconnection TLR Procedure, as reflected in Attachment 1 to reliability standard IRO-006-0, to divide the reliability requirements and business practices, and to incorporate other necessary improvements to the TLR procedure. In December 2004 NERC and NAESB formed the joint TLR Subcommittee to clarify and focus Attachment 1 to NERC reliability standard IRO-006-0 on the TLR requirements that are necessary for reliability, as distinguished from those TLR requirements that are business practices.

The subject SAR is required to revise Attachment 1 (Transmission Loading Relief Procedure — Eastern Interconnection) of IRO-006-0 (Reliability Coordination — Transmission Loading Relief) in accordance with the final work products of the NERC/NAESB TLR Subcommittee. NERC representatives to the TLR Subcommittee included members of the IDC Working Group, the Distribution Factors Working Group, the Reliability Coordinator Working Group, the Operating Reliability Subcommittee, the Operating Committee, and NERC staff.

Please review the SAR, as well as the additional information related to the SAR, posted on the NERC website and complete this Comment Form to provide feedback to the requestor on the proposed standards.

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- 1. Do you believe there is a reliability need for this proposed standard change? If not, please explain in the comment area.**

Yes

No

Comments: We do not feel there is a reliability need for the proposed standard "change". We would contend that the change provides confusion to a very important reliability process. In order to understand the process the standard and the business practice are necessary.

- 2. Do you believe the TLR Subcommittee appropriately divided the elements of TLR business practices vs. TLR reliability requirements? If not, please explain in the comment area.**

Yes

No

Comments: The reliability and business practices within the TLR process are integrated to such an extent that the details need to remain contained within a single document for clarity. Concerns regarding the ability to effectively manage the model and the process with the current proposed split need to be addressed. The ability to follow developing market issues must also be retained. Steps 1.4.1, 1.4.1.1, 1.5, 1.5.1, 1.6, 1.7, 2.1.2, 2.2.2, 2.4.2, 2.5.2, 3.2.1.2, 3.3.1.2, 7.1, are reliability related and should remain in the standard. The dynamic schedule part of 1.6.6 was added to the Standard in June of this year with approval of 100% of the ballot body. It should remain as part of this standard.

- 3. Do you believe there are still elements of TLR business practices that remain in the proposed TLR reliability requirements? If not, please explain in the comment area.**

Yes

No

Comments:

- 4. Do you believe there are still elements of TLR reliability requirements that remain in the proposed TLR business practices? If not, please explain in the comment area.**

Yes

No

Comments: See comments in question 2.

- 5. Do you have any other comments on these proposed changes?**

Yes

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No

Comments: The IESO does not fully support the modifications proposed in this SAR. The proposed change provides confusion to a very important reliability process. Also the proposed standard references a NAESB standard which is inconsistent with the NERC Standards Process Manual which says "All mandatory requirements of a reliability standard shall be within an element of the standard. Supporting documents to aid in the implementation of a standard may be referenced by the standard but are not part of the standard itself." There are mandatory parts of the proposed standard in the NAESB business practice that are necessary for the successful implementation of this reliability standard. With the two documents being modified by separate entities there is a good chance that the documents will not be coordinated and kept in synchronization when changes are made. As acknowledged by the TLR Subcommittee that worked to create this proposed split, the business practices and reliability aspects of TLR are very intertwined. In effect, the information in both the proposed NERC and NAESB standard must be simultaneously available to the Operators in the Control Room, in order for them to operate the system reliably. While the effort to create this initial split in the TLR standards has been completed, consideration should be given as to how this split will be maintained, if going forward, before it is adopted by the industry. Operator training issues, as well as the ownership and funding of the IDC tool should be considered in this evaluation before such a significant step is taken on a standard that is fundamental to the reliability of the Eastern Interconnection. This is an important process that requires a complete understanding of the impact of separating the business practice from the reliability concepts. It is not clear that the current proposed document split will retain the integrity of the TLR process. The potential negative impact of degrading the RC's ability to manage loop flow dictates that any change in documentation and responsibility must proceed carefully.