

Reliability Standards Tracking Comments & Responses

3/28/11 9:23 am

IRO-006-TRE-1 IROL and SOL Mitigation in the ERCOT Interconnection (SAR-009)

02/03/2011 through 03/07/2011

1. The proposed Regional Reliability Standard is intended to satisfy the FERC directive in Paragraph 964 of Order 693, where FERC directed the ERO to provide requirements corresponding to the existing ERCOT congestion management procedures. Do you agree that this Regional Reliability Standard adequately satisfies the FERC directive? If not, please explain in the comment area.

Name: **Ness, Thad K**
Phone: **614-716-2053**
Segment: **Transmission and Distribution**
Answer: **Yes**

Organization: **AEPSC: AEP Tex Nrth & Cen, PS of Ok-4006**
Department:

Name: **Myers, H. Steven**
Phone: **512-248-3077**
Segment: **System Coordination and Planning**
Answer: **Yes**

Organization: **Elec Reliab. Council of Texas, Inc.-4056**
Department: **Compliance**

Comment

Response

Other NERC Reliability Standards already require functional entities to manage transmission loading and other functional entities to comply with instructions or directives from those functional entities. This regional standard specifically addresses action(s) to be taken when operations beyond the market-based systems are required to mitigate exceedances of limits. These actions are manually initiated and require responses beyond those which the automated market systems have issued.

Thank you for your comment.

2. The posted draft includes Requirements for the RC to have procedures to identify and mitigate exceedances of identified Interconnection Reliability Operating Limits (IROL) and System Operating Limits (SOL) and to direct action to identify and mitigate such exceedances (R1 and R2). Do you agree with these Requirements? If not, please explain in the comment area.

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Comment

Although other NERC Reliability Standards require functional entities to manage transmission loading (congestion management), these proposed requirements are specific to the processes used in the ERCOT Interconnection.

Response

Thank you for your comment.

3. The posted draft includes a list of subjects that the procedures under Requirement R1 should address. Is this list of subjects sufficient and appropriate? If not, please explain in the comment area.

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4. The Measures in the current draft request evidence from the RC. Do you agree with the Measures contained in the current draft? If not, please explain in the comment area.

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5. Do you agree with the Effective Date as included in the current draft? If not, please explain in the comment area.

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Comment

It is unclear if the effective date as provided in the draft will be retained once the standard is approved, as the effective is not included within the standard. We assume that the effective date will be included as part of the standard once it is approved. In addition, it would be helpful for TRE to provide clarity on regulatory approval. Does approval date refer to FERC approval.

Response

The stated effective date in the standard is "The first day of the first calendar quarter after applicable regulatory approval." In the U.S., "applicable regulatory approval" means the effective date of the FERC final order approving the standard. The specific date on which this standard becomes mandatory and enforceable will be posted by NERC.

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6. Do you agree that the Violation Risk Factors (VRFs), Violation Security Levels (VSLs) and Time Horizons assigned to each requirement satisfy the applicable criteria and guidelines? If not, please explain in the comment area.

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Department:

Comment

Additional gradients could be added to the severity levels. Regarding R1 for example, not all elements of the standard are represented within the table. For example, there could be a different severity level associated with a procedure that did not identify how to mitigate exceedances of identified IROLs and SOLs, but the procedure does specify the identification of the exceedances.

Response

In order to meet the reliability objective stated in the Purpose, the team feels that all of the procedures are necessary and are appropriately treated in the VSL table. Also, the RC already has these procedures in place.

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7. Do you have any other comments to improve the draft standard? If so, please explain in the comment area.

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