

July 24, 2007

Mr. Gerry Adamski
Director of Standards
North American Electric Reliability Corporation

Independent Electricity
System Operator
655 Bay Street
Suite 410, PO Box 1
Toronto, Ontario M5G 2K4
t 416 506 2800
www.ieso.ca

Dear Gerry:

Re: DRAFT Requests for Data to Fulfill FERC Order No. 693 Requirements

I am writing on behalf of the IESO in response to the solicitation for comments with respect to three draft requests for data needed to fulfill requirements identified in the Federal Energy Regulatory Commission's (FERC) Order No. 693. According to NERC, responses to these data requests will enable NERC to respond in a timely manner to directives located in paragraphs 629, 951, and 1693 of the Order: Restoration of Nuclear Power Plant Offsite Power Source Data Request, Interconnection Reliability Operating Limit Data Request, and Transmission Planning Data Request respectively.

In its solicitation for comments, NERC explains that the legal basis in the United States for these requests is Section 39.2(d) of the FERC regulations and section 215 of the Federal Power Act. NERC also states that its approach for requesting data is generally consistent with the approach outlined in NERC's proposed data rule, Section 1600. The IESO submitted comments to NERC on July 3rd, 2007 in response to the May 21st request for comment on the proposed rule.

In each of the three draft requests for data, NERC explains that the data will be collected and provided to FERC primarily in response to FERC directives. Given that the IESO is non-jurisdictional and that the use of the data is not specified in the request the IESO will not be providing the data requested in Attachments A and B on behalf of Ontario. Attachment C states that the data will also be used for NERC reliability purposes. As such, the IESO will provide this data as NERC states that the reliability information will be used by the Planning Committee and/or the NERC standards draft teams related to Project 2006-02 (*Transmission Assessment and Plans*). Similar to our Section 1600 comments, NERC should seek the IESO's permission before providing this information to external governmental authorities.

On the issue of IROL's the IESO also notes that the industry appears to have different interpretations, treatments and calculation methodologies relating to IROL's. To address this issue NERC's Operating Limit Development Task Force (OLDTF) is developing a concept paper, soliciting industry inputs and pursuing consensus on the various aspects of IROL's. We believe that it is prudent that this work be allowed to continue to completion before any changes to IROL methodologies, via NERC's standards process, are proposed.

I want to stress that the IESO continues to support an effective international ERO. In this regard, the IESO will continue to provide NERC with data and information required to improve the reliability of the bulk power system.

Respectfully Submitted,

Kim Warren
Manager, Regulatory Affairs
Independent Electricity System Operator of Ontario