

Comment Form – Coordinate Operations Drafting Team’s Proposed Implementation Plan & Recommended changes to Version 0 Standards

Please use this form to submit comments on the Coordinate Operations Drafting Team’s proposed Implementation Plan and recommendations for retirement or revision to Version 0 Standards. Comments must be submitted by **August 8, 2005**. You must submit the completed form by emailing it to sarcomm@nerc.com with the words “Implementation Plan Coord Ops Standard Comments” in the subject line. If you have questions please contact Mark Ladrow at 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/Khaqan Khan	
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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		

Coordinate Operations Standard Implementation Plan and Recommendations for Retirement/Revision of Associated Version 0 Standards – Comment Form

Background:

Coordinate Operations Standard Drafting Team has considered the comments submitted with the last posting of this set of standards and has posted the following documents for stakeholder review:

- Clean version of the 3rd draft of the Coordinate Operations Standards
- Implementation Plan
- Red Line version of Version 0 Standards recommended for retirement or revision

The Drafting Team feels that there is consensus on the content of these standards and wants to move the standards forward for balloting. As an interim step, the Standards Authorization Committee asked the Drafting Team to solicit feedback on its recommendations for retirement or revision of Version 0 standards and on the Implementation Plan. The Drafting Team is recommending the following changes to Version 0 Standards coincident with the implementation of the Coordinate Operations Standards:

- COM-002-0 Communications and Coordination
 - Modify R2; retire R2.1, R2.2, R2.3

- EOP-002-0 Capacity and Energy Emergencies
 - Modify R2; retire R4

- IRO-003-0 Reliability Coordination – Wide Area View
 - Retire R2

- IRO-004-0 Reliability Coordination – Operations Planning
 - Retire R6; modify R7

- IRO-005-0 Reliability Coordination – Current Day Operations
 - Modify R7, R9, R11, R12, R15

- TOP-005-0 Operational Reliability Information
 - Modify R3

The Coordinate Operations Standard Drafting Team’s Implementation Plan includes full compliance within 9 months from the effective date. Thus, if the Board of Trustees adopts the standards on November 1, the standards would become effective on January 1, 2006 and entities would have until October 1, 2006 to achieve full compliance.

The Drafting Team’s reasoning for the above recommendations are included in the Implementation Plan for this set of standards. Please read the Implementation Plan and respond to the questions to let the Drafting Team know if you support its recommendations.

Note that the Standards Authorization Committee directed the drafting team to change the term, ‘Reliability Authority’ to ‘Reliability Coordinator’ in this set of proposed standards. This change should make the standards easier to implement. In addition, the numbering of the standards was changed from the “TOP” prefix (Transmission Operations) to the “IRO” prefix (Interconnection Reliability Operations and Coordination).

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Please Enter All Comments in Simple Text Format.

Questions:

Insert a “check” mark in the appropriate boxes by double-clicking the gray areas.

- 1. Do you agree with modifying Reliability Standard COM-002-0_R2 and retiring COM-002-0_R2.1, R2.2, R2.3 coincident with the implementation of the Coordinate Operations Standards? If no, please comment.**

Yes

No

Comments:

- 2. Do you agree with modifying Reliability Standard EOP-002-0_R2 and retiring EOP-002-0_R4 coincident with the implementation of the Coordinate Operations Standards? If no, please comment.**

Yes

No

Comments:

- 3. The ‘concept’ contained in EOP-002-0_R9 is covered in proposed IRO-014-1_R1.1.2 and IRO-015-1_R1. EOP-002-0_9 requires the Reliability Coordinator to initiate an Energy Emergency Alert under certain conditions – IRO-014-1 and IRO-015-1 require the Reliability Coordinator to have an energy emergency plan and to make notifications to other Reliability Coordinators according to that energy emergency plan, but the proposed standards don’t include any specific references to use of the Energy Emergency Alerts. The Drafting Team recommends leaving EOP-002-0_R9 intact because removing that requirement would leave a ‘hole’ in EOP-002-0. Do you agree with the Drafting Team that EOP-002-0_R9 should remain in EOP-002-0?**

Yes

No

Comments:

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- 4. Do you agree with retiring IRO-003-0_R2 coincident with the implementation of the Coordinate Operations Standards? If no, please comment.**

- Yes
 No

Comments: We do not fully agree with the modification of IRO-003-0_R2 and its conversion to IRO-016-1_R1 as proposed. The IESO recommends requirement R1 of Standard IRO-016-1 be revise to include specific examples. We suggest the following revision in R1 ... " The Reliability Coordinator that identifies a potential, expected or actual problem such as but not limited to declining voltages, excessive reactive flows or an IROL violation, in a neighbouring Reliability Coordinator Area, it shall"

- 5. Do you agree with retiring IRO-004-0_R6 and modifying IRO-004-0_R7 coincident with the implementation of the Coordinate Operations Standards? If no, please comment.**

- Yes
 No

Comments: The IRO-004-0_R7 should be modified by including few more specifics in IRO-014-1_R1. With regards to modifying IRO-004-R7, we suggest that the listing outlined in IRO-014-1_R1 section R1.1 pertaining to Operating procedures, Processes or Plans be qualified/expanded to include more specifics such as "addressing the potential SOL or IROL violation and an associated need to take any necessary actions"

- 6. Do you agree with modifying Reliability Standard IRO-005-0_R7, IRO-005-0_R9, IRO-005-0_R11, IRO-005-0_R12 and IRO-005-0_R15 coincident with the implementation of the Coordinate Operations Standards?**

- Yes
 No

Comments: re: IRO-005-0_R11 (IRO-016-1_R1). Standard IRO-005-0-R11 now being replaced with IRO-016-1:R1 generically covers a general statement but not the "specific requirements" for actions to be taken for any "Intercondition frequency deviations". We feel that a specific limit on Interconnection frequency deviation with a duration of time may be more appropriate; esp. for consistency and compliance purposes. We recommend that a clause/requirement similar to that outlined in Policy 9 requirement 4 should be added in

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IRO-016-1 R1 i.e. "INTERCONNECTION frequency error in excess of 0.03 Hz(eastern) for more than 20 minutes requiring a hotline conf call or initiating notification via RCIS.

re: IRO-005-0_R15 (IRO-016-1_R1) Similarly, the statements regarding "problems" in R1 of IRO-016-1 should be revised to include few specifics such as SOL or IROl violation, loss of reactive reservesetc)

7. Do you agree with modifying Reliability Standard TOP-005-0_R3 coincident with the implementation of the Coordinate Operations Standards?

Yes

No

Comments:

8. Are you aware of any other Version 0 Requirements that should be retired or revised coincident with the implementation of the set of Coordinate Operations Standards?

Yes

No

Comments: See comment in Q 6 above re:IRO-005-0_R11 (IRO-016-1_R1).

9. Do you agree that 9 months beyond the date of the Board of Trustees' adoption is sufficient time for entities to meet the requirements and measures in this set of standards? If no, please identify any requirement or measure that you feel will require more than 9 months of preparation time and identify what will take longer and how much time you estimate is needed.

Yes

No

Comments:

10. Do you have any other comments on these proposed standards?

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Comments: With regards to Standard IRO-014-1, we suggest that an entity should not be penalized with Level 4 for non-compliance with an administrative issue. The Level 4 is assigned due to a lack of up-to-date revision in documents which may not be appropriate. We suggest deleting the Level 4 statement and/or restricting this up to a maximum level of Level 2.

IRO-014-1 requirement R1.1.1 incorrectly refers RAs. It should be corrected to read "..... to be exchanged with other RCs"