

Comment Form for First Posting of SAR and Standard to Modify IRO-004-0

Please use this form to submit comments on the Interchange Distribution Calculator Working Group's first draft of the SAR and standard for modifications to IRO-004-0. Comments must be submitted by **April 3, 2006**. You must submit the completed form by e-mailing it to sarcomm@nerc.com with the words "IRO-004-IDCWG" 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	
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NERC Region	<input type="checkbox"/>	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) and the Operating Reliability Subcommittee recommend revisions to IRO-004-0 to require that information needed by Eastern Interconnection reliability coordinators, transmission operators, and balancing authorities to perform next day operational analysis, shall be submitted in the next hourly system data exchange update. This is a change from the current practice which requires that Eastern Interconnection data be provided by 1200 Central Standard Time. The purpose of this change is to improve the reliability of system studies. Conforming changes were made to the levels of non-compliance. No changes were made to the data submittal timing requirements for the Western Interconnection.

The following footnote was added to clarify the scope of data that is required to be provided:

A critical Facility as defined in this standard shall be any bulk electric Facility that may be adversely affected by a Contingency in another system or if a SOL or IROL exists for the Facility. At a minimum the critical Facility statuses shall include:

1. Any transmission equipment 100 kV and above
 2. Any generation Facility 20 MW and above
1. Do you agree with the SAR and the proposed revision to IRO-004 to require that information needed for Eastern Interconnection system studies be provided with the next hourly system data exchange? If not, please explain why you disagree.

Yes

No

Comments: The IESO agrees with the need to align IRO-004 requirements for the Eastern Interconnection with the NERC Reliability Coordinator Reference Document. We further suggest that a need exists to ensure the data requirements for the system data exchange (SDX) are appropriately incorporated in NERC standards for its various purposes. However, this change in isolation may result in discrepancies with others NERC standards and fails to fully capture the various functions and uses of the SDX data. For example, R1.1 to R1.3 in TOP-003 stipulate that planned outage information (a subset of the information required in IRO-004) shall be made available by 1200 CST for the Eastern Interconnection. Should TOP-003 also be revised accordingly? Another discrepancy is the class of facility whose planned or foreseen status needs to be reported (please see comments on Question 2, below).

The IESO further suggests that the scope of a SAR be precisely established and accepted by industry, as opposed to the inclusion of revised standards along with the SAR. Although it may appear efficient, industry must first agree with the SAR, otherwise the value of commenting on the revised standard becomes questionable if you disagree with the scope of the SAR.

2. Do you agree with the language in the proposed footnote in IRO-004 to clarify the scope of data that must be provided for system studies? If not, please explain why you disagree.

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Yes

No

Comments: We do not agree with the definition of the term "Critical Facility". We feel that a Critical Facility should be one whose status affects other facilities or has a system impact rather than one whose status is affected by external events (such as as contingency) or to which there is an assigned SOL or IROL. We therefore suggest the following wording if a definition on Critical Facility is to be introduced: "any electricity facility which, when removed from service, may have an adverse impact on system reliability or on the SOL or IROL in the facility's system or another system.

We also disagree with the minimum threshold for generation facility. The 20 MW threshold is different from that stipulated in TOP-003 which requires reporting of planned outages of generator greater than 50 MW. This discrepancy also needs to be resolved by revising TOP-003, or by adopting the same 50 MW threshold in the definition for Critical Facility in IRO-004.

3. Do you agree with the Implementation Plan for IRO-004? If not, please explain why you disagree.

Yes

No

Comments: The above mentioned discrepancies need to be resolved before the standard can be considered for pre-ballot posting.

We further suggest that if the standard is to be revised, R4 should more clearly indicate to whom (the RC?) and via what means (the SDX?) the needed information is to be provided.