

## Comment Form for 3<sup>rd</sup> Posting of Operate within Interconnection Reliability Operating Limits Standard

Note – This form is to comment on version 3 of the Monitor and Assess Short-term Transmission Reliability – Operate Within Transmission Limits Standard (now called ‘Operate Within Interconnection Reliability Operating Limits’.)

The latest version of this Standard (OPER\_WITHN\_LMTS\_05\_03) is posted on the Standards website at: <http://www.nerc.com/~filez/standards/Monitor-Assess.html>

E-mail this form between March 1–April 14, 2004, to: [sarcomm@nerc.com](mailto:sarcomm@nerc.com) with “Comments” in the subject line.

If you have any questions about this Standards draft comment form, please contact Gerry Cauley, the Director-Standards at 609-452-8060 or [Gerry.Cauley@nerc.net](mailto:Gerry.Cauley@nerc.net)

### Major Changes Requested to this Standard:

The Standards Drafting Team made several changes to this standard, based on the comments submitted during the first ballot of this standard. You can see the Standards Drafting Team’s consideration of every comment submitted with a ballot at:

<http://www.nerc.com/~filez/standards/Monitor-Assess.html>

### The SDT’s most significant changes include the following:

- Clarified the definitions of ‘widespread impact,’ ‘cascading outages’ and ‘bulk electric system’ so they are measurable.
- Modified the definition of  $T_v$  to align its definition with interconnection risk rather than sanctions and to indicate that  $T_v$  can’t exceed 30 minutes.
- Modified Requirement 201 for IROL Identification to better reflect the dynamic nature of IROLs
- Modified Requirement 201 to add language to ensure that RAs that share a Facility (or group of Facilities) have an agreed upon process for determining if the Facility is subject to IROLs and for developing the IROL and its  $T_v$
- Modified Requirement 204 for RA Actions to indicate that the RA must act ‘without delay’ to prevent or mitigate instances of exceeding IROLs
- Modified the sanction associated with operating outside an IROL for time greater than  $T_v$  to make the sanction proportional to both the magnitude and the duration of the incident.

### Changes outside the Scope of the SDT:

Several Balloters asked the SDT to make some changes that are outside the scope of the SDT.

These changes include the following:

- Wait until the Functional Model is modified, re-approved and/or better understood
- Wait until related Standards are approved
- Wait until Field Testing is conducted
- Expand the scope to include operating outside all System Operating Limits — not just those that could cause instability, cascading outages or uncontrolled separation

### *Wait for the Functional Model*

The SDT cannot guarantee that the Functional Model will never change. However, the SDT can state that the Functional Model is the approved basis for writing the current standards. NERC’s current Policies and Standards were based upon the concept of a control area. Recent events (such as the creation of GENCOs, TRANSCO and generation-only control areas) have shown that NERC’s vision of control area is no longer a valid basis for writing standards. The task-based Functional Model is the approved alternative.

The Functional Model defines tasks and relationships. To date the Functional Model’s tasks and relationships remain virtually the same as they were in the original version. The addition of

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separating the tasks between owner and operator did not invalidate the Functional Model. Neither did the inclusion of the Planning Functions invalidate the Functional Model. If new subdivisions of tasks are required, then the standards will have to be amended appropriately. However, to wait until everyone can agree on the future of our industry would commit NERC to permanent inaction.

### ***Wait for Related Standards***

These new standards are not ‘stand-alone’ — there are many inter-dependencies between these standards. It is not practical to ‘wait’ for one standard to be completed before finalizing another standard. Because we are developing these standards in parallel, rather than in series, the Standard Drafting Teams don’t have control over the completion of any other standard. The NERC BOT directed the teams to proceed with development of standards without delay — and that is what the drafting teams are trying to do. If NERC had more time to develop a new set of standards, then it would be better to develop the standards ‘one at a time’ — but the industry has an urgent need for a new set of standards to be in place as soon as possible.

### ***Wait for Field Testing***

The Director-Compliance is responsible for working with the Standards Authorization Committee in determine if there is a need to conduct field-testing of a standard. In this case, the Director-Standards recommended against field-testing, and this recommendation was supported by the Standards Authorization Committee. The decision to conduct field-testing is not within the scope of the SDT.

### ***Expand the scope to include all System Operating Limits (SOLs)***

The scope of this standard was limited to the subset of SOLs that are IROLs. The SDT recognizes that exceeding **any** SOL is unacceptable, but adding requirements to this standard that address exceeding SOLs is outside the scope of the associated SAR. The SDT is drafting another SAR to address monitoring and operating within SOLs.

### ***SDT Assumptions about the RA’s monitoring and directing actions to prevent exceeding an IROL***

The SDT developed this standard with an assumption that entities would act honorably and with integrity. This standard requires that IROLs have both a magnitude and a duration component ( $T_v$ ). The SDT assumes that RAs following this standard will not exceed any IROL for any ‘emerging condition’. RAs should be constantly monitoring their RA Area and should take pre-emptive actions to prevent ever exceeding an IROL. Emerging situations should never result in an instance of exceeding an IROL. However, if a plane hits a set of transmission lines, an IROL may be exceeded and actions need to be taken without delay. For the unusual situation such as the plane crash, an IROL may be exceeded but not for a time greater than its  $T_v$ .

### ***Levels of Non-compliance***

Several balloters asked that additional levels of non-compliance be added to the standard. Where this seemed reasonable, additional levels were added. The table on the following pages provides a comparison of the levels of non-compliance for all the requirements in this standard, with the SDT’s reasoning for the assignments.

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Requirements	First Offense	Second Offense	Reasoning
<b>1. IROL Identification</b>			
(Level1) No process for addressing 'shared' Facilities	Letter to VP	Letter to VP	Shared facilities require cooperation between RAs. Not documenting a process for addressing these shared facilities is not as bad as not having any evidence that the RAs have agreed on which Facilities are subject to IROLs. Not having 'joint' agreement on which shared Facilities are subject to IROLs is a less severe infraction than not having a list of Facilities subject to IROLs for the RA's own Reliability Area.
(Level 2) No evidence that the RAs with a shared Facility have agreed on whether that Facility is subject to an IROL	Letter to VP	Letter to CEO \$1,000	
(Level 3) One or more IROLs had a T <sub>v</sub> greater than 30 minutes	Letter to CEO \$1,000 fine	Letter to CEO \$2,000 fine	Having a T <sub>v</sub> greater than 30 minutes may pose an unacceptable risk to the interconnection.
(Level 3) List of Facilities subject to IROLs not updated	Letter to CEO \$1,000 fine	Letter to CEO \$2,000 fine	The System Operators need to know this information – having an out of date list is not good, but it is better than not having any of the data
(Level 4) No list of facilities subject to IROLs	Letter to CEO \$2,000	Letter to CEO \$4,000	The System Operators need this information – without knowing what facilities are subject to IROLs, the System Operators may allow a limit to be exceeded for so long that it causes a cascading outage . . .
(Level 4) Unable to produce current IROLs	Letter to CEO \$2,000	Letter to CEO \$4,000	
<b>2. Monitoring</b>			
(Level 2) List of Facilities subject to IROLs not available for Real-time use	Letter to VP	Letter to CEO \$1,000	This information is needed for situational awareness. If operations personnel are aware of the facilities subject to IROLs they will pay closer attention to these facilities. However, not having this information is not as bad as not having current IROLs for real-time use.
(Level 4) IROLs not available to system operators for real time use	Letter to CEO \$2,000	Letter to CEO \$4,000	System Operators need to constantly monitor real time data and compare this against IROLs. If this isn't done, then there is a risk that a critical limit will be approached or exceeded and the system operator won't be aware of the condition – if left unknown, the limit could cause a cascading outage, . . .
(Level 4) Real-time data can't be compared to IROLs	Letter to CEO \$2,000	Letter to CEO \$4,000	
(Level 4) System Operators not monitoring real-time data against IROLs	Letter to CEO \$2,000	Letter to CEO \$4,000	

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<b>3. Analyses and Assessments</b>			
(Level 3) Can't show that an operational planning analysis was done once/day	Letter to CEO \$1,000 fine	Letter to CEO \$2,000 fine	Conducting the analyses and assessments is critical to identifying conditions that exist or may exist in the near future. If some analyses were 'skipped', this is not acceptable — the entity was 'lucky' and the sanction is a warning.
(Level 3) Can't show that a real-time assessment was done every 30 minutes	Letter to CEO \$1,000 fine	Letter to CEO \$2,000 fine	
(Level 4) Didn't do an operational planning analysis or a real-time assessment well enough to know if there are any actual or potential instances of exceeding an IROL.	Letter to CEO \$2,000	Letter to CEO \$4,000	Analyses and assessments need to result in the system operator KNOWING whether there is an actual or potential problem — if the analyses and assessments don't result in the system operator KNOWING whether there is an actual or potential problem, then this is the same as not having done the analysis or assessment.
<b>4. Actions</b>			
(Level 1) IROL exceeded for a time less than or equal to $T_v$ and no documentation to indicate actions taken or directives issued to mitigate the instance.	Letter to VP	Letter to VP	All instances of exceeding an IROL are serious. The Compliance Monitor needs to use the RA's documentation as a reference in auditing other entities to verify that the RA's Directives have been followed. Data relative to IROLs must be collected so that it is available for reliability studies.
(Level 4) Exceeded an IROL's magnitude and duration components.	Letter to CEO Variable \$\$ fine	Letter to CEO Variable \$\$ fine	This is the worst possible violation in this standard — and carries the harshest sanction. If an IROL is exceeded, then the interconnection has been placed in an unacceptable risk.

<b>5. Data Specification</b>			
(Level 1) Specification incomplete	Letter to CEO	Letter to CEO	<p>The data specification needs to be complete. Most entities already exchange data, and some entities may not have a 'complete' data specification. A lower level sanction recognizes that some data that is supplied may not be documented on a specification, and there may need to be some 'warnings' to motivate the RA to improve its documentation.</p> <p>The RA is strongly motivated to perform well and is required to meet stringent certification requirements so the RA will most certainly request the data it needs.</p>
(Level 2) Specification not distributed	Letter to VP	Letter to CEO \$1,000	<p>The data specification needs to be distributed so other entities can provide the needed data. Most entities already exchange data, and some entities may not have a 'complete' data specification. A lower level sanction was applied in recognition that some entities may already be exchanging data without a documented data specification, and there may need to be some 'warnings' to motivate the RA to improve its documentation.</p>
<b>6. Data Provision</b>			
(Level 4) Data not provided as specified and situation not resolved	Letter to CEO \$2,000	Letter to CEO \$4,000	<p>If data is needed and specified in a written document, then it does need to be provided. Not providing data that has been formally requested is serious because it can jeopardize the RA's ability to accurately monitor and assess its Reliability Area. In most cases, the Compliance Monitor only finds out about this violation if the RA tries to resolve the discrepancy, but the RA is unable to obtain the data it needs.</p>

<b>7. Procedures, Processes or Plans for Preventing and Mitigating Instances of Exceeding IROLs</b>			
(Level 1) Exist but not coordinated with all with all other RAs	Letter to VP	Letter to VP	If an entity has a document, then that entity has gone through the process of determining appropriate actions and has provided the document to its system operators for real time use. If the document isn't coordinated with other entities that need to act as part of that document, then there needs to be some sanction to motivate the involved entities to 'sign on the dotted line'. Without some formal agreement between all involved entities, there is no assurance that everyone involved will act as needed without unnecessary delays. These sanctions recognize that involving some of the other entities that need to act as part of the 'plan' is not as unacceptable as not involving any of the other entities that need to act as part of the 'plan'.
(Level 2) Exist but not coordinated with any other RAs	Letter to VP	Letter to CEO \$1,000	
(Level 3) Documents exist but don't address both preventing and mitigating IROLs	Letter to CEO \$1,000 fine	Letter to CEO \$2,000 fine	These sanctions recognize that having some documents is better than having no documents — but every RA should have documents that can be followed so that the RA's staff will be prepared.
(Level 4) Documents do not exist	Letter to CEO \$2,000	Letter to CEO \$4,000	
<b>8. RA Directives</b>			
(Level 1) Documentation incomplete	Letter to VP	Letter to VP	All operations involving IROLs are serious. The Compliance Monitor needs to review the documentation in concert with the RA's documentation for the same incident, to verify that the RA's Directives have been followed.
(Level 4) Didn't follow directives	Letter to CEO \$2,000	Letter to CEO \$4,000	This is an extremely serious violation since not following the RA's directives can jeopardize the reliability of the interconnection.



### Questions about Definitions

1. The SDT revised the definition of Bulk Electric System to clarify what portion of the electric system was included. Do you agree with the revised definition?

**Bulk Electric System:** A term commonly applied to the portion of an electric utility system that encompasses the electrical generation resources and high voltage transmission system (above 35 kV or as approved in a tariff filed with FERC).

- Yes                       No  
 Comments

This definition should be reliability “performance based” and references to tariffs should be removed. The existing NPCC definition for its **Bulk Power System** is:

“The interconnected electrical systems within northeastern North America comprising generation and transmission facilities on which faults or disturbances can have significant adverse impact outside of the local area. Local areas are determined by the Council members.”

Furthermore, the New York State Reliability Council (NYSRC) feels that in no instance should a BES criterion encompass facilities at voltage levels less than 115 kV and strongly urges the eventual adoption of a “performance based” definition.

2. Several balloters indicated that they didn’t know if a studied event would meet the old definition of a cascading outage. The SDT adopted criteria currently used by the Department of Energy as the threshold for disturbance reporting. DOE uses, “Uncontrolled loss of 300 MW or more of firm system loads for more than 15 minutes from a single incident” as one of its thresholds for reporting disturbances.

If a study shows that exceeding an SOL will result in the uncontrolled successive loss of 300 MW or more of networked system load for 15 minutes or more — then that SOL is considered an IROL. Do you agree with the revised definition?

**Cascading Outages:** The uncontrolled successive loss of system elements triggered by an incident at any location that results in the loss of 300 MW or more of networked system load for a minimum of 15 minutes.

- Yes                       No  
 Comments

An event characterized by one or more of the following phenomena:

- the loss of **power** system **stability**
- cascading outages of circuits
- oscillations; abnormal ranges of frequency or voltage, or both.

The NYSRC feels it is not the threshold of 300 MW that qualifies an incident to be classified as a cascading outage. The loss of 300 MW of load may have nothing to do with cascading or uncontrolled successive losses, 300 MW of load may be lost under certain conditions, but it doesn’t necessarily pose a risk to the interconnection. We believe that the standard specify that the cascading outages not propagate beyond the local area (i.e. Control Area). Moreover, the definition of “Cascading Outage” as outlined in Standard 200 is different from that defined in draft Standard

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600 (Develop Facility Ratings, ...). It is recommended to follow a common definition as given in Standard 600, including a minor modification, as follows:

**“The uncontrolled successive loss of Bulk Electric System elements that propagate beyond a defined area (Balancing Area’s) boundaries.”**

In addition, specific examples about how IROLs are calculated, including specific contingency pair examples for things like thermal limits, are needed such that the whole industry can understand what an IROL is.

3. Several balloters indicated a preference for a definition of  $T_v$  that referenced a link to risk rather than a link to a sanction. Most balloters indicated a preference for an upper limit to  $T_v$ . Do you agree with the revised definition?

$T_v$ : The maximum time that an Interconnection Reliability Operating Limit can be exceeded before the risk to the interconnection becomes greater than acceptable.  $T_v$  may not be greater than 30 minutes.

- Yes                       No  
 Comments

The NYSRC agrees that the  $T_v$  should be limited to 30 minutes. However, the last sentence should read “ $T_v$  shall not be greater than 30 minutes”.

We suggest that discussion in the Q&A document be added to include the rationale as to why  $T_v$  under 30 minutes is required.

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4. Several balloters indicated a continued misunderstanding of the difference between 'wide area impact' and 'local area'. The SDT modified the definition in an attempt to make the definition more objective. The Department of Energy currently requires that any single incident involving the uncontrolled loss of 300 MW or more of firm system loads be reported on form DOE EIA 417. The SDT adopted this criterion as the threshold for determining whether the impact of an event was 'widespread'. (Note that while the term, 'wide area impact' is not used in this standard, it is used in the definition of an IROL.) Do you agree with the revised definition for Wide Area Impact?

Wide Area Impact: The impact of a single incident resulting in the uncontrolled loss of 300 MW or more of networked system load for a minimum of 15 minutes.

- Yes             No  
 Comments

It is proposed that the definition of "Widespread Area" from the NERC OLDTF Report (that was validated by RCWG at its December 2003 meeting and was accepted by NERC OC at its March 2004 meeting) be used in Standard 200 as well. It is stated as below:

**Widespread Area** An area that extends beyond any LOCAL AREA.

**Local Area** The portion of a WIDESPREAD AREA, whose boundaries are predetermined by appropriate analyses, where the impact of a CONTINGENCY or other event will not cause instability, uncontrolled separations or cascading outages to propagate beyond those predetermined boundaries (i.e., will not impact the overall reliability of a major portion of the Interconnection.) Impact to a WIDESPREAD AREA indicates significant impact to the INTERCONNECTION.

OR an alternative option/suggestion is also proposed as follows:

"The impact of an incident resulting in uncontrolled successive loss of system elements in networked system and where the consequences of such significant adverse impact cannot be contained within a defined area that can be demonstrated by studies."

Wide Area Impact may also be defined correlating it to occurrences of an event impacting more than one Reliability Authority.

5. Several other definitions had minor changes. Please identify any definitions you feel need to be revised, and if possible suggest a revision.

- Yes             No  
 Comments

The terms/definitions in the Standards should be consistent with the terms/definitions outlined in Functional Model (version 2). As an example, there is an inconsistency in the definition of Transmission Operator, i.e., the definition of Transmission Operator should be updated to reflect the definition stated in version 2 of the Functional Model, i.e., "operates or directs the operation".

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Definitions should be in one place, not in each standard, and definitely should not appear if they are in the Functional Model document.

The definition of IROL presently given in the recent modified template P2T1 (System Operating/Interconnected Reliability Operating Limits Violations) may better serve the purpose in Standard 200 as well. It is suggested to use the same definition with few modifications, as follows:

**“A subset of system operating limits, which if exceeded, could expose a Widespread Area of the Bulk Electrical system to instability, uncontrolled separations(s) or cascading outages.”**

### Questions about Requirement 201 — IROL Identification

6. Do you agree with the following new measure developed to support the requirement that addresses the handling of ‘shared’ Facilities?

The Reliability Authorities that share a Facility (or group of Facilities) shall have an agreed upon process for determining if that Facility (or group of Facilities) is subject to an Interconnection Reliability Operating Limit and for determining the value of that Interconnection Reliability Operating Limit and its associated  $T_v$

- Yes                       No  
 Comments

Concern exists that the process required may be too formalized and could be a simple e-mail or telephone call that requires affirmation, and a formal legal agreement should not be required.

### Questions about Requirement 201 — IROL Identification, continued

7. Several balloters asked that the SDT to change this requirement to better reflect that IROLs can be dynamic. The SDT modified the requirement so that instead of requiring a ‘list’ of IROLs, the RA must be able to identify the ‘current value’ of its IROLs. Do you agree with this change?

- Yes                       No  
 Comments

While the standard considers the requirements that IROLs can be dynamic, it also needs to provide guidance to operators to identify IROLs as they occur. Also, refer to comments given in question 13.

In addition, the System Operators must have the tools, training and information to deal with unforeseen circumstances and make the proper decisions to secure the system in an expeditious and orderly manner following a contingency or other event.

8. Do you agree with the compliance monitoring process?

- Yes                       No  
 Comments

The NYSRC doesn’t agree with having a list of facilities.

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Also, what constitutes evidence that a list was updated from an auditing perspective? The requirements need to be clear as to what exactly is needed.

9. Do you agree with the levels of non-compliance?

- Yes                       No  
 Comments

What constitutes evidence that a list was updated from an auditing perspective?

10. Several balloters indicated a concern over coordination of IROLs between RAs. Do you think the standard should include a requirement that the RA obtain agreement from its adjacent RAs on which Facilities in the combined RA Areas are subject to IROLs?

- Yes                       No  
 Comments

There should be a mutual agreement on the process of coordination among RAs. The process could be that both Areas calculate a separate limit for common facilities based upon the internal transmission configuration. However, the Areas agree that they will operate to the more conservative limit of the different calculation results. Furthermore, it is expected that a need for appropriate analysis/studies shall be outlined that could identify such common impacted facilities. Such requirements can be included in Standard 600.

11. Several balloters requested that the SDT change the standard to include a requirement that RAs publicly post their IROLs. The SDT could not identify a reliability-related reason to support this. Do you want the standard to require public posting of IROLs?

- Yes                       No  
 Comments

12. Other comments about Requirement 201:

**Questions about Requirement 202 — Monitoring**

13. Several balloters recommended the following addition to this requirement. Do you agree with this addition?

(i) The RA shall provide the following information to its system operators:  
(a) The system conditions under which the Interconnection Reliability Operating Limit applies,  
(b) The contingency that is the basis for the limit,  
(c) The impact of exceeding the limit

- Yes                       No  
 Comments

Although this is a desirable addition, it should consistently appear throughout the document.

**Questions about Requirement 204 — Actions**

14. Several balloters commented about the level of documentation required in this standard. The SDT noted that without additional clarification, the entity that receives an RA's directive may not realize that the directive is related to an IROL. To improve the 'situational awareness' of directives related to IROLs, the SDT added this requirement. Do you agree with the addition of this requirement?

Each directive issued relative to an IROL shall include a statement to inform the recipient that the directive is related to an IROL

- Yes                       No  
 Comments

All directives should be acted on irrespective if they are IROL or not. Statements such as this perhaps might be better documented in the Coordinate Operation Standard.

15. Some balloters suggested that the SDT modify the criteria for determining the duration of an IROL event. The language currently in the standard is shown below. One balloter suggested that the '30 seconds' be modified to '1 minute' – another balloter suggested that a longer duration should be required and suggested 10 minutes. The 30 seconds was intended to represent the maximum duration associated with a 'bad telemetry scan.'

The duration of the event shall be measured from the point when the limit is exceeded to the point when the system has returned to a state that is within the Interconnection Reliability Operating Limit for a minimum of 30 seconds.

- Keep the minimum of 30 seconds  
 Change the minimum to 1 minute  
 Change the minimum to 10 minutes  
 Comments

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16. Several balloters requested that the sanction for exceeding an IROL for time greater than the IROL's  $T_v$  be modified so that the sanction is proportional to both the magnitude and the duration of the event. The SDT modified the sanction so that it would be the greater of the fixed dollar sanction listed in the matrix, or the dollar amount that corresponds to the magnitude and duration of the event as highlighted in the following table.

Do you agree with this table?

Yes

No!

Comments

The NYSRC is opposed to monetary sanctions as the only option for dealing with noncompliance as applied in this and other proposed NERC Standards. Unfortunately, direct monetary sanctions invite “gaming the system”, and encourage “business” decisions based on potential profits or savings versus potential penalties. Instead of monetary sanctions, the NYSRC prefers that NERC have the authority to issue letters of increasing degrees of severity to communicate noncompliance of mandatory standards. The NYSRC and NPCC now rely on a more stringent and mandatory process than monetary sanctions to assure compliance with reliability standards. Compliance is now mandatory through the contractual agreements and tariffs that all participants need in order to conduct business. The use by the NYSRC and NPCC of letters to regulatory agencies and other oversight bodies for reporting noncompliance has demonstrated that letter sanctions are a more effective tool for ensuring adherence to standards. Such letters establish the basis for liability in the event of a subsequent criterion violation, and in the case of market participant noncompliance, threaten the violator’s ability to do business with or through an ISO or RTO. Moreover, letters that communicate noncompliance best allow focus on the “root cause” of a violation, as well as its reliability impact.

Therefore, the NYSRC recommends that this and other NERC Standards expressly provide that letter sanctions be used in addition to or instead of monetary sanctions under circumstances in which they would be an equally or more effective enforcement mechanism.

<b>If the Maximum Value % over the Limit (measured after the event duration exceeds <math>T_v</math>) is:</b> Max Value % = (Max Value/ IROL limit -1)*100	<b>And the event duration exceeds its <math>T_v</math> by ___ minutes:</b>	<b>Then Multiply the Level 4 \$ sanction by:</b>
0% < Max Value % ≤ 5%	$T_v < \text{Duration} \leq T_v + 5 \text{ minutes}$	5
	$T_v + 5 \text{ minutes} < \text{Duration} \leq T_v + 10 \text{ minutes}$	10
	$T_v + 10 \text{ minutes} < \text{Duration} \leq T_v + 15 \text{ minutes}$	15
	$\text{Duration} > T_v + 15 \text{ minutes}$	20
5% < Max Value % ≤ 10%	$T_v < \text{Duration} \leq T_v + 5 \text{ minutes}$	10
	$T_v + 5 \text{ minutes} < \text{Duration} \leq T_v + 10 \text{ minutes}$	15
	$T_v + 10 \text{ minutes} < \text{Duration} \leq T_v + 15 \text{ minutes}$	20
	$\text{Duration} > T_v + 15 \text{ minutes}$	25
10% < Max Value % ≤ 15%	$T_v < \text{Duration} \leq T_v + 5 \text{ minutes}$	15
	$T_v + 5 \text{ minutes} < \text{Duration} \leq T_v + 10 \text{ minutes}$	20
	$T_v + 10 \text{ minutes} < \text{Duration} \leq T_v + 15 \text{ minutes}$	25

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	Duration > $T_v + 15$ minutes	30
15% < Max Value % ≤ 20%	$T_v < \text{Duration} \leq T_v + 5$ minutes	20
	$T_v + 5$ minutes < Duration ≤ $T_v + 10$ minutes	25
	$T_v + 10$ minutes < Duration ≤ $T_v + 15$ minutes	30
	Duration > $T_v + 15$ minutes	35
20% < Max Value % ≤ 25%	$T_v < \text{Duration} \leq T_v + 5$ minutes	25
	$T_v + 5$ minutes < Duration ≤ $T_v + 10$ minutes	30
	$T_v + 10$ minutes < Duration ≤ $T_v + 15$ minutes	35
	Duration > $T_v + 15$ minutes	40
25% < Max Value % ≤ 30%	$T_v < \text{Duration} \leq T_v + 5$ minutes	30
	$T_v + 5$ minutes < Duration ≤ $T_v + 10$ minutes	35
	$T_v + 10$ minutes < Duration ≤ $T_v + 15$ minutes	40
	Duration > $T_v + 15$ minutes	45

**Questions about Requirement 207 — Processes, Procedures or Plans for Preventing and Mitigating IROLs**

17. Several balloters asked for more clarification on the term 'action plan' that was used in the last version of this standard. Several other drafting teams have used the terms, 'processes, procedures or plans' to clarify that the document required may be general in nature or very specific, as long as the document addresses the required topic. In response, the SDT changed the phrase, 'action plan' to 'processes, procedures or plans' throughout this requirement. Do you agree with this change?

- Yes                       No  
 Comments

**Other Questions about this Standard**

18. Are you a member of the Ballot Pool (or do you represent a member of the Ballot Pool) for this standard?

- Yes, I am a member of the Ballot Pool, or I represent a member of the Ballot Pool for this standard  
 No, I am not a member of the Ballot Pool for this standard  
 Comments

19. If you are a member of the Ballot Pool (or if you represent a member of the Ballot Pool), do you agree with the technical content of this standard? Note that the technical content of the standard consists **solely** of the individual Requirements and their associated Measures — the Compliance Monitoring Process, Levels of Non-compliance and Sanctions are **not** considered part of the 'technical content' of the standard.

- I am a member of the Ballot Pool or I represent a member of the Ballot Pool and **I do agree** with the Technical Content of this standard.  
 I am a member of the Ballot Pool or I represent a member of the Ballot Pool and **I do not agree** with the Technical Content of this standard.  
 I am not a member of the Ballot Pool nor do I represent a member of the Ballot Pool for this standard. **I do agree** with the Technical Content of this standard.  
 I am not a member of the Ballot Pool nor do I represent a member of the Ballot Pool for this standard. **I do not agree** with the Technical Content of this standard.  
 Comments

20. If you are a member of the Ballot Pool (or if you represent a member of the Ballot Pool), will you vote on this standard based on its content (requirements, measures, compliance monitoring process and levels of non-compliance), or will you withhold your approval based on factors related to the standards process? This would include factors such as changes to the Functional Model, the removal of Financial Sanctions from the Compliance Enforcement Program, or the inclusion of Field Testing.

- I am a member of the Ballot Pool or I represent a member of the Ballot Pool and **I will vote on this standard based solely on its content**

**Comment Form for 3<sup>rd</sup> Posting of Operate within Interconnection Reliability Operating Limits Standard**

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- I am a member of the Ballot Pool or I represent a member of the Ballot Pool and **I will vote against this standard until other standards-related issues are resolved.**
- Not applicable – I am not a member of the Ballot Pool nor do I represent a member of the Ballot Pool

21. Other Comments about this Standard:

The footnote on Standard 201 states that each IROL is developed by following the requirements in “Determine Facility Ratings, SOLs & Transfer Capabilities”, i.e., Standard 600. Such requirements with respect to IROL are not mentioned in Standard 600, and it is expected that the upcoming revised standard will include this requirement; otherwise, it is recommended to delete the keynote from Standard 200.

Owing to the fact that the “T<sub>v</sub>” value can be smaller than 30 minutes, it is suggested to update the sub-section 203 (b) (ii) as follows: “The Reliability authority shall conduct a Real-Time Assessment periodically, once every 30 minutes or lesser, as applicable, in order to capture the allowable lesser duration T<sub>v</sub>s.

A general comment on the standard: It seems overly burdensome with documentation and less focused on performance.

Examples regarding the individual definitions might be helpful if added in an accompanying document.

The Standard should address repeated, planned IROL violations that don’t exceed or consistently approach T<sub>v</sub> and preventing this/discouraging this mode of operation from reoccurring. **It is not OK to exceed IROLs.** There are entities that frequently exceed them for short periods of time for economic or other reasons which are not reportable because they do not exceed T<sub>v</sub>. This behavior must be discouraged through measurement of frequency and severity of IROL through the reporting mechanisms outlined in this standard, and as outlined in new template P2 T1 “*System Operating/IROL Violations*”. In addition, there were no IROL T<sub>v</sub> violations reported to NERC as a result of the events occurring on August 14, 2003, which implies either more stringent reporting is required or the IROL and T<sub>v</sub> limit need to be reevaluated.