2006-06 Reliability Coordination

Standards Involved:

COM-001-1 — Telecommunications

COM-002-2 — Communications and Coordination

IRO-001-1 — Reliability Coordination – Responsibilities and Authorities

IRO-002-1 — Reliability Coordination – Facilities

IRO-005-2 — Reliability Coordination – Current-Day Operations

IRO-014-1 — Procedures to Support Coordination between Reliability Coordinators

IRO-015-1 — Notifications and Information Exchange Between Reliability Coordinators

IRO-016-1 — Coordination of Real-time Activities between Reliability Coordinators

Research Needed:

Operating Committee study of IROLs and situational awareness tools

Brief Description

Most of the requirements in this set of standards were translated from Operating Policies as part of the Version 0 process. There have been suggestions for improving these requirements, and the drafting team will consider comments submitted by stakeholders, drafting teams and FERC in determining what changes should be proposed to stakeholders. The drafting team will review all of the requirements in this set of standards and make a determination, with stakeholders, on whether to:

- Modify the requirement to improve its clarity and measureability while removing ambiguity Move the requirement (into another SAR or Standard or to the certification process or standards)
- Eliminate the requirement (either because it is redundant or because it doesn't support bulk power system reliability).

The development may include other improvements to the standards deemed appropriate by the drafting team, with the consensus of stakeholders, consistent with establishing high quality, enforceable and technically sufficient bulk power system reliability standards.

Standards Development Status:

Project 2006-06 Reliability Coordination Web page

Project Schedule:

Project 2006-06 Schedule

Target Completion Date:

Fourth quarter of 2008

Related Links:

Project 2006-06 Roster

COM-001-1 Telecommunications

Issues FERC Order 693

Disposition: Approved with modifications

• Include generator operators and distribution providers in the list of applicable entities and create appropriate requirements for them.

- Address TAPS, Entergy, Six Cities, and FirstEnergy concerns through the standard development process.
- Specify requirements for using telecommunication facilities during normal and emergency conditions that reflect the roles of the applicable entities and their impact of reliable operation, and include adequate flexibility.

V0 Industry Comments

- Redundant with Policy 5A, R1
- Many players missing
- Apply R1 to all but smallest entities

VRF comments

• R6 – administrative requirement

Other

• Modify standard to conform to the latest version of NERC's Reliability Standards Development Procedure, the NERC Standard Drafting Team Guidelines, and the ERO Rules of Procedure.

COM-002-2 Communications and Coordination

Issues FERC Order 693

Disposition: Approved with modifications

- Include distribution providers in the list of applicable entities.
- Address APPA's concern through the standard development process.
- Include a requirement for the reliability coordinator to assess and approve only those actions that have impacts beyond the area views of the transmission operators and balancing authorities. Include how to determine whether an action needs to be assessed by the reliability coordinator.
- Consider Xcel's suggestion that the entity taking operating actions should not be held responsible for the delays caused by the reliability coordinator's assessment and approval.
- Address Santa Clara, FirstEnergy, and Six Cities concerns in the reliability standards development process.
- Include APPA's suggestions to complete the measures and levels of non-compliance.
- Require tightened communications protocols, especially for communications during alerts and emergencies.

V0 Industry Comments

- Voice with generators not required
- R1 include reliability authority
- R2 include sabotage and security
- R4 clarify repeat back requirement with regard to emergency

Other

• Modify standard to conform to the latest version of NERC's Reliability Standards Development Procedure, the NERC Standard Drafting Team Guidelines, and the ERO Rules of Procedure.

IRO-001-1 Reliability Coordination – Responsibilities and Authorities **Issues** FERC Order 693

Disposition: Approve with modifications

- Eliminate the references to the regional reliability organization as an applicable entity.
- Consider commenters' suggestions as part of the standards development process.
- Consider adding measures and levels of non-compliance

Regional Fill-in-the-Blank Team Comments

- Remove ", sub-region, or interregional coordinating group" from R1
- Consider removing "Standards of conduct are necessary to ensure the Reliability Coordinator does not act in a manner that favors one market participant over another." from the Purpose section of the standard.

V0 Industry Comments

- Inability to perform needs to be communicated
- What is meant by 'interest of other entity'?

VRF comments

• R6 - Since the RC must be NERC certified, it stands to reason that anyone performing RC tasks should be certified. However, since the RC still retains the accountability for actions, and requirement 4 handles the agreements, this requirement is a medium risk.

Other

• Modify standard to conform to the latest version of NERC's Reliability Standards Development Procedure, the NERC Standard Drafting Team Guidelines, and the ERO Rules of Procedure.

IRO-002-1 Reliability Coordination – Facilities

Issues FERC Order 693

Disposition: Approved with modifications

• Require a minimum set of tools that must be made available to the reliability coordinator.

VO Industry Comments

- R5 define synchronized information system
- R7 define 'adequate' tools and 'wide-area'
- \bullet Words such as 'easily understood' and 'particular emphasis' need to be tightened

Other

• Modify standard to conform to the latest version of NERC's Reliability Standards Development Procedure, the NERC Standard Drafting Team Guidelines, and the ERO Rules of Procedure.

IRO-005-2 Reliability Coordination – Current-Day Operations

Issues FERC Order 693

Disposition: Approved with modifications

- Provide further clarification that reliability coordinators and transmission operators direct control actions, not LSEs as part of the standard development process.
- Include measures and levels of non-compliance.
- Measures and levels of non-compliance specific to IROL violations must be commensurate with the magnitude, duration, frequency, and causes of the violations and whether these occur during normal or contingency conditions.
- Conduct a survey on IROL practices and actual operating experiences by requiring reliability coordinators to report any violations of IROLS, their causes, the date and time, the durations and magnitudes in which actual operations exceeds IROLs to NERC on a monthly basis for one year beginning August 2, 2007.

Fill-in-the-Blank Team Comments

• R14 has regional reference

V0 Industry Comments

• R10, 11 & 12 – RA not empowered to do this

Other

• Modify standard to conform to the latest version of NERC's Reliability Standards Development Procedure, the NERC Standard Drafting Team Guidelines, and the ERO Rules of Procedure.

IRO-014-1 Procedures, Processes, or Plans to Support Coordination Between Reliability Coordinators

Issues FERC Order 693 Disposition: Approved

Other

• Modify standard to conform to the latest version of NERC's Reliability Standards Development Procedure, the NERC Standard Drafting Team Guidelines, and the ERO Rules of Procedure.

IRO-015-1 Notifications and Information Exchange Between Reliability Coordinators **Issues** FERC Order 693

Disposition: Approved

Other

• Modify standard to conform to the latest version of NERC's Reliability Standards Development Procedure, the NERC Standard Drafting Team Guidelines, and the ERO Rules of Procedure.

IRO-016-1 Coordination of Real-Time Activities Between Reliability Coordinators Issues FERC Order 693

Disposition: Approved

VRF comments

• R1.2.1 & R2 – ambiguous

Other

• Modify standard to conform to the latest version of NERC's Reliability Standards Development Procedure, the NERC Standard Drafting Team Guidelines, and the ERO Rules of Procedure.