

Technical Rationale for Reliability Standard

IRO-002-6

December 18, 2019

IRO-002-6 – Reliability Coordination – Monitoring and Analysis

During development of IRO-002-5, text boxes are embedded within the standard to explain the rationale for various parts of the standard. Upon Board adoption of IRO-002-5, the text from the rationale text boxes will be moved to this section.

Rationale text from the development of IRO-002-4 in Project 2014-03 follows. Additional information can be found on the Project 2014-03 [project page](#).

Changes made to the proposed definitions were made in order to respond to issues raised in NOPR paragraphs 55, 73, and 74 dealing with analysis of SOLs in all time horizons, questions on Protection Systems and Special Protection Systems in NOPR paragraph 78, and recommendations on phase angles from the SW Outage Report (recommendation 27). The intent of such changes is to ensure that Real-time Assessments contain sufficient details to result in an appropriate level of situational awareness. Some examples include: 1) analyzing phase angles which may result in the implementation of an Operating Plan to adjust generation or curtail transactions so that a Transmission facility may be returned to service, or 2) evaluating the impact of a modified Contingency resulting from the status change of a Special Protection Scheme from enabled/in-service to disabled/out-of-service.

Rationale for Requirements:

The data exchange elements of Requirements R1 and R2 from approved IRO-002-2 have been added back into proposed IRO-002-4 in order to ensure that there is no reliability gap. The Project 2014-03 SDT found no proposed requirements in the current project that covered the issue. Voice communication is covered in proposed COM-001-2 but data communications needs to remain in IRO-002-4 as it is not covered in proposed COM-001-2. Staffing of communications and facilities in corresponding requirements from IRO-002-2 is addressed in approved PER-004-2, Requirement R1 and has been deleted from this draft.

Rationale for R2:

Requirement R2 from IRO-002-3 has been deleted because approved EOP-008-1, Requirement R1, part 1.6.2 addresses redundancy and back-up concerns for outages of analysis tools. New Requirement R4 (R6 in IRO-002-5) has been added to address NOPR paragraphs 96 and 97: *“...As we explain above, the reliability coordinator’s obligation to monitor SOLs is important to reliability because a SOL can evolve into an IROL during deteriorating system conditions, and for potential system conditions such as this, the*

reliability coordinator's monitoring of SOLs provides a necessary backup function to the transmission operator...."

Rationale for Requirements R1 and R2:

The proposed changes address directives for redundancy and diverse routing of data exchange capabilities (FERC Order No. 817 Para 47).

Redundant and diversely routed data exchange capabilities consist of data exchange infrastructure components (e.g., switches, routers, servers, power supplies, and network cabling and communication paths between these components in the primary Control Center for the exchange of system operating data) that will provide continued functionality despite failure or malfunction of an individual component within the Reliability Coordinator's (RC) primary Control Center. Redundant and diversely routed data exchange capabilities preclude single points of failure in primary Control Center data exchange infrastructure from halting the flow of Real-time data. Requirement R2 does not require automatic or instantaneous fail-over of data exchange capabilities. Redundancy and diverse routing may be achieved in various ways depending on the arrangement of the infrastructure or hardware within the RC's primary Control Center.

The reliability objective of redundancy is to provide for continued data exchange functionality during outages, maintenance, or testing of data exchange infrastructure. For periods of planned or unplanned outages of individual data exchange components, the proposed requirements do not require additional redundant data exchange infrastructure components solely to provide for redundancy.

Infrastructure that is not within the RC's primary Control Center is not addressed by the proposed requirement.

Rationale for Requirement R3:

The revised requirement addresses directives for testing of data exchange capabilities used in primary Control Centers (FERC Order No. 817 Para 51).

A test for redundant functionality demonstrates that data exchange capabilities will continue to operate despite the malfunction or failure of an individual component (e.g., switches, routers, servers, power supplies, and network cabling and communication paths between these components in the primary Control Center for the exchange of system operating data). An entity's testing practices should, over time, examine the various failure modes of its data exchange capabilities. When an actual event successfully exercises the redundant functionality, it can be considered a test for the purposes of the proposed requirement.

Rationale for R4 (R6 in IRO-002-5):

The requirement was added back from approved IRO-002-2 as the Project 2014-03 SDT found no proposed requirements that covered the issues.