

Staff Proposed Changes to Previously Balloted Violation Severity Levels (Interconnected Reliability Operations)

In its June 19, 2008 VSL Order, FERC directed NERC to review all Violation Severity Level assignments, (with the exception of those for which the Commission directed specific modification), for compliance with Guidelines 2b, 3, and 4 and submit a compliance filing either validating the current Violation Severity Level assignments or proposing revision. Here are the relevant "Guidelines":

- Guideline 2b — VSLs should not use ambiguous terms such as "minor" or "significant" to describe noncompliant performance.
- Guideline 3 — VSLs should be consistent with the corresponding requirement (VSLs should not expand on what is in the requirement).
- Guideline 4 — VSLs should be based on a single violation, not on a cumulative number of violations (unless stated otherwise in the requirement).

FERC also directed NERC to modify some VSLs and identified these VSLs in Appendix A of its VSL Order. The VSLs have been reviewed, balloted, and reviewed again for consistency with the FERC Guidelines. The review subsequent to the last ballot identified some discrepancies and inconsistencies in the VSL assignments last balloted. The VSLs in this document focus solely on those proposed changes necessary to resolve those inconsistencies. Each change is accompanied by an explanation, which provides the rationale for the proposed change.

The following tables show the previously balloted language and the staff proposed VSLs, edited with conforming changes made based on stakeholder comments submitted during the formal comment period that ended September 16, 2010.

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IRO-001-1.1 – Reliability Coordination – Responsibilities and Authorities					
	<i>VSL</i>	<i>Lower</i>	<i>Moderate</i>	<i>High</i>	<i>Severe</i>
R1. Each Regional Reliability Organization, subregion, or interregional coordinating group shall establish one or more Reliability Coordinators to continuously assess transmission reliability and coordinate emergency operations among the operating entities within the region and across the regional boundaries.	<i>Balloted Language</i>	The RRO, subregion or interregional coordinating group did not communicate the assignment of the Reliability Coordinators to operating entities clearly.	The RRO, subregion or interregional coordinating group did not clearly identify the coordination of Reliability Coordinator areas within the region.	The RRO, subregion or interregional coordinating group did not coordinate assignment of the Reliability Coordinators across regional boundaries.	The RRO, subregion or interregional coordinating group did not assign any Reliability Coordinators.
R1	<i>Proposed Change</i>	N/A	N/A	N/A	N/A
Explanation – Per Section 100 of NERC’s Rules of Procedure, requirements assigned to the Regional Entity (RRO) are addressed as a Rules of Procedure violation, rather than through the Compliance program. Therefore, VSLs for this requirement are inappropriate.					
R2. The Reliability Coordinator shall comply with a regional reliability plan approved by the NERC Operating Committee.	<i>Balloted Language</i>	The Reliability Coordinator has failed to follow the administrative portions of its regional reliability plan.	The Reliability Coordinator has failed to follow steps in its regional reliability plan that requires operator interventions or actions.	The Reliability Coordinator does not have a regional reliability plan approved by the NERC OC.	The Reliability Coordinator does not have an unapproved regional reliability plan.
R2	<i>Proposed Change</i>	N/A	N/A	N/A	The Reliability Coordinator did not comply with the approved plan.
Explanation – The VSLs were modified to be consistent with FERC Guideline 3.					
R3. The Reliability Coordinator shall have clear decision-making authority to act and to direct actions to be taken by Transmission Operators, Balancing Authorities, Generator Operators, Transmission Service Providers, Load-Serving	<i>Balloted Language</i>	N/A	N/A	The Reliability Coordinator cannot demonstrate that it has clear authority to act or direct actions to preserve transmission security and reliability of the Bulk Electric System.	The Reliability Coordinator failed to take or direct to preserve the reliability and security of the Bulk Electric System within 30 minutes of identifying those actions.

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IRO-001-1.1 – Reliability Coordination – Responsibilities and Authorities					
	<i>VSL</i>	<i>Lower</i>	<i>Moderate</i>	<i>High</i>	<i>Severe</i>
Entities, and Purchasing-Selling Entities within its Reliability Coordinator Area to preserve the integrity and reliability of the Bulk Electric System. These actions shall be taken without delay, but no longer than 30 minutes.					
R3	<i>Proposed Change</i>	N/A	N/A	The Reliability Coordinator cannot demonstrate that it has clear authority to act or direct actions to preserve transmission security and reliability of the Bulk Electric System.	The Reliability Coordinator failed to take or direct action to preserve the reliability and security of the Bulk Electric System within 30 minutes of identifying those actions.
Explanation – The VSLs were modified for clarity and consistency with other standards and VSLs.					
R4. Reliability Coordinators that delegate tasks to other entities shall have formal operating agreements with each entity to which tasks are delegated. The Reliability Coordinator shall verify that all delegated tasks are understood, communicated, and addressed within its Reliability Coordinator Area. All responsibilities for complying with NERC and regional standards applicable to Reliability Coordinators shall remain with the Reliability Coordinator.	<i>Balloted Language</i>	1. Less than 25% of the tasks are not documented in the agreement or 2. Less than 25% of the tasks are not performed according to the agreement.	1. More than 25% but 50% or less of the tasks are not documented in the agreement or 2. More than 25% but 50% or less of the tasks are not performed according to the agreement.	1. More than 50% but 75% or less of the tasks are not documented in the agreement or 2. More than 50% but 75% or less of the tasks are not performed according to the agreement.	1. There is no formal operating agreement for tasks delegated by the Reliability Coordinator, 2. More than 75% of the tasks are not documented in the agreement or 3. More than 75% of the tasks are not performed according to the agreement.
R4	<i>Proposed Change</i>		The Reliability Coordinator has delegated tasks to other entities and had formal		The Reliability Coordinator has delegated tasks to other entities but failed to have

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IRO-001-1.1 – Reliability Coordination – Responsibilities and Authorities					
	<i>VSL</i>	<i>Lower</i>	<i>Moderate</i>	<i>High</i>	<i>Severe</i>
			operating agreements with each of these entities but could not verify that delegated tasks were understood, communicated, and addressed within its Reliability Coordinator Area.		a formal operating agreement delegating tasks to each of these entities.
Explanation – The VSLs were modified for clarity and consistency with other standards and VSLs.					
R7. The Reliability Coordinator shall have clear, comprehensive coordination agreements with adjacent Reliability Coordinators to ensure that System Operating Limit or Interconnection Reliability Operating Limit violation mitigation requiring actions in adjacent Reliability Coordinator Areas are coordinated.	<i>Balloted Language</i>	The Reliability Coordinator has demonstrated the existence of coordination agreements with adjacent Reliability Coordinators but the agreements are not clear or comprehensive.	The Reliability Coordinator has demonstrated the existence of the coordination agreements with adjacent Reliability Coordinators but the agreements do not coordinate actions required in the adjacent Reliability Coordinator to mitigate SOL or IROL violations in its own Reliability Coordinator area.	The Reliability Coordinator has demonstrated the existence of the coordination agreements with adjacent Reliability Coordinators but the agreements do not coordinate actions required in the adjacent Reliability Coordinator to mitigate SOL and IROL violations in its own Reliability Coordinator area.	The Reliability Coordinator has failed to demonstrate the existence of any coordination agreements with adjacent Reliability Coordinators.
R7	<i>Proposed Change</i>	The Reliability Coordinator has demonstrated the existence of coordination agreements with adjacent Reliability Coordinators but the agreements are not clear or comprehensive.	N/A	The Reliability Coordinator has demonstrated the existence of coordination agreements with adjacent Reliability Coordinators but the agreements do not coordinate actions	The Reliability Coordinator has failed to demonstrate the existence of any coordination agreements with adjacent Reliability Coordinators.

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IRO-001-1.1 – Reliability Coordination – Responsibilities and Authorities					
	<i>VSL</i>	<i>Lower</i>	<i>Moderate</i>	<i>High</i>	<i>Severe</i>
				required in the adjacent Reliability Coordinator Area to mitigate SOL and IROL violations in its own Reliability Coordinator area.	
Explanation – The VSLs were modified for clarity and consistency with other standards and VSLs.					

IRO-002-1 – Reliability Coordination - Facilities					
	<i>VSL</i>	<i>Lower</i>	<i>Moderate</i>	<i>High</i>	<i>Severe</i>
R6. Each Reliability Coordinator shall monitor Bulk Electric System elements (generators, transmission lines, buses, transformers, breakers, etc.) that could result in SOL or IROL violations within its Reliability Coordinator Area. Each Reliability Coordinator shall monitor both real and reactive power system flows, and operating reserves, and the status of Bulk Electric System elements that are or could be critical to SOLs and IROLs and system restoration requirements within its Reliability Coordinator Area.	<i>Balloted Language</i>	The Reliability Coordinator failed to monitor: 1) the status, real power flow or reactive power flow of Bulk Electric System elements that could result in one SOL violations or 2) or operating reserves for a small portion of the Reliability Authority Area.	The Reliability Coordinator failed to monitor: 1) the status, real power flow or reactive power flow of Bulk Electric System elements critical to assessing one IROL or to system restoration, 2) the status, real power flow or reactive power flow of Bulk Electric System elements that could result in multiple SOL violations, or 3) operating reserves.	The Reliability Coordinator failed to monitor: 1) the status, real power flow or reactive power flow of Bulk Electric System elements critical to assessing two or more IROLs; or one IROL and to system restoration, 2) the status, real power flow or reactive power flow of Bulk Electric System elements that could result in multiple SOL violations and operating reserves, or 3) the status, real power flow or reactive power flow of Bulk Electric System elements critical to assessing one IROL or system restoration and operating reserves.	The Reliability Coordinator failed to monitor: 1) the status, real power flow or reactive power flow of Bulk Electric System elements critical to assessing all IROLs and to system restoration, or 2) the status, real power flow or reactive power flow of Bulk Electric System elements critical to assessing all SOL violations and operating reserves.
R6	<i>Proposed Change</i>	N/A	N/A	The Reliability Coordinator monitored BES elements (generators, transmission lines, buses, transformers, breakers, etc.) but failed to monitor one or more of the following: the status, real power flow, reactive power flow or operating reserves for a	The Reliability Coordinator failed to monitor the BES elements associated with a potential SOL/IROL or that are critical to system restoration.

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IRO-002-1 – Reliability Coordination - Facilities

	<i>VSL</i>	<i>Lower</i>	<i>Moderate</i>	<i>High</i>	<i>Severe</i>
				BES facility that is associated with a potential SOL/IROL or is critical to system restoration.	
Explanation – The VSLs were modified to be consistent with FERC Guideline 3, as well as for clarity and consistency with other standards and VSLs.					
R9. Each Reliability Coordinator shall control its Reliability Coordinator analysis tools, including approvals for planned maintenance. Each Reliability Coordinator shall have procedures in place to mitigate the effects of analysis tool outages.	<i>Balloted Language</i>	Reliability Coordinator has approval rights for planned maintenance outages of analysis tools but does not have approval rights for work on analysis tools that creates a greater risk of an unplanned outage of the tools.	Reliability Coordinator has approval rights for planned maintenance but does not have plans to mitigate the effects of outages of the analysis tools.	Reliability Coordinator has approval rights for planned maintenance but does not have plans to mitigate the effects of outages of the analysis tools and does not have approval rights for work on analysis tools that creates a greater risk of an unplanned outage of the tools.	Reliability Coordinator approval is not required for planned maintenance.
R9	<i>Proposed Change</i>	N/A	The Reliability Coordinator has approval rights for planned maintenance outages of its analysis tools, but there is no procedure to mitigate the effects of these outages.	N/A	The Reliability Coordinator does not have a procedure in place to control its analysis tools including approvals for planned maintenance.
Explanation – The VSLs were modified to be consistent with FERC Guideline 3.					

Note: IRO-002-2 includes requirements identical to those in IRO-002-1 with the exception that Requirement R2 from IRO-002-1 was retired. The VSLs approved for IRO-002-1 will be applied to IRO-002-2.

IRO-003-2 – Reliability Coordination – Wide Area

	<i>VSL</i>	<i>Lower</i>	<i>Moderate</i>	<i>High</i>	<i>Severe</i>
R1. Each Reliability Coordinator shall monitor all Bulk Electric System facilities, which may include sub-transmission information, within its Reliability Coordinator Area and adjacent Reliability Coordinator Areas, as necessary to ensure that, at any time, regardless of prior planned or unplanned events, the Reliability Coordinator is able to determine any potential System Operating Limit and Interconnection Reliability Operating Limit violations within its Reliability Coordinator Area.	<i>Balloted Language</i>	N/A	N/A	The Reliability Coordinator failed to monitor all Bulk Electric System facilities, which may include sub-transmission information, within its Reliability Coordinator Area and adjacent Reliability Coordinator Areas, as necessary to ensure that, at any time, regardless of prior planned or unplanned events, the Reliability Coordinator is able to determine any potential System Operating Limit and Interconnection Reliability Operating Limit violations within its Reliability Coordinator Area.	The Reliability Coordinator failed to monitor Bulk Electric System facilities, which may include sub-transmission information, within adjacent Reliability Coordinator Areas, as necessary to ensure that, at any time, regardless of prior planned or unplanned events, the Reliability Coordinator is able to determine any potential System Operating Limit and Interconnection Reliability Operating Limit violations within its Reliability Coordinator Area.
R1	<i>Proposed Change</i>	N/A	N/A	The Reliability Coordinator failed to demonstrate it monitored the applicable facilities within its own Reliability Coordinator Area. OR The Reliability Coordinator failed to demonstrate it monitored the applicable facilities within adjacent Reliability Coordinator Areas.	The Reliability Coordinator failed to demonstrate it monitored the applicable facilities within its own Reliability Coordinator Area. AND The Reliability Coordinator failed to demonstrate it monitored the applicable facilities within adjacent Reliability Coordinator Areas

Explanation – The VSLs were modified to be consistent with FERC Guideline 3.

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IRO-004-2 – Reliability Coordination – Operations Planning					
	<i>VSL</i>	<i>Lower</i>	<i>Moderate</i>	<i>High</i>	<i>Severe</i>
R1. Each Transmission Operator, Balancing Authority, and Transmission Service Provider shall comply with the directives of its Reliability Coordinator based on the next day assessments in the same manner in which it would comply during real time operating events.	<i>Balloted Language</i>	The responsible entity failed to comply with the directives of its Reliability Coordinator based on the next day assessments in the same manner in which it would comply during real time operating events on one (1) occasion during a calendar month.	The responsible entity failed to comply with the directives of its Reliability Coordinator based on the next day assessments in the same manner in which it would comply during real time operating events on two (2) to three (3) occasions during a calendar month.	The responsible entity failed to comply with the directives of its Reliability Coordinator based on the next day assessments in the same manner in which it would comply during real time operating events on four (4) to five (5) occasions during a calendar month.	The responsible entity failed to comply with the directives of its Reliability Coordinator based on the next day assessments in the same manner in which it would comply during real time operating events on more than five (5) occasions during a calendar month.
R1	<i>Proposed Change</i>	N/A	N/A	N/A	The responsible entity failed to comply with the directives of its Reliability Coordinator based on the next day assessments in the same manner in which it would comply during real time operating events.
Explanation – The VSLs were modified to be consistent with FERC Guideline 4.					

IRO-005-2 - Reliability Coordination – Current Day Operations					
	<i>VSL</i>	<i>Lower</i>	<i>Moderate</i>	<i>High</i>	<i>Severe</i>
R1. Each Reliability Coordinator shall monitor its Reliability Coordinator Area parameters, including but not limited to the following:	<i>Balloted Language</i>	The Reliability Coordinator failed to monitor one (1) of the elements listed in IRO-005-2 R1.1 through R1.10.	The Reliability Coordinator failed to monitor two (2) of the elements listed in IRO-005-2 R1.1 through R1.10.	The Reliability Coordinator failed to monitor three (3) of the elements listed in IRO-005-2 R1.1 through R1.10.	The Reliability Coordinator failed to monitor more than three (3) of the elements listed in IRO-005-2 R1.1 through R1.10.
R1.1. Current status of Bulk Electric System elements (transmission or generation including critical auxiliaries such as Automatic Voltage Regulators and Special Protection Systems) and system loading.	<i>Balloted Language</i>	N/A	N/A	N/A	The Reliability Coordinator failed to monitor the current status of Bulk Electric System elements (transmission or generation including critical auxiliaries such as Automatic Voltage Regulators and Special Protection Systems) and system loading.
R1.2. Current pre-contingency element conditions (voltage, thermal, or stability), including any applicable mitigation plans to alleviate SOL or IROL violations, including the plan's viability and scope.	<i>Balloted Language</i>	N/A	N/A	N/A	The Reliability Coordinator failed to monitor current pre-contingency element conditions (voltage, thermal, or stability); including any applicable mitigation plans to alleviate SOL or IROL violations, including the plan's viability and scope.
R1.3. Current post-contingency element conditions (voltage, thermal, or stability), including any applicable mitigation plans to alleviate SOL or IROL violations, including the plan's viability and scope.	<i>Balloted Language</i>	N/A	N/A	N/A	The Reliability Coordinator failed to monitor current post-contingency element conditions (voltage, thermal, or stability); including any applicable mitigation plans to

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IRO-005-2 - Reliability Coordination – Current Day Operations					
	<i>VSL</i>	<i>Lower</i>	<i>Moderate</i>	<i>High</i>	<i>Severe</i>
					alleviate SOL or IROL violations, including the plan's viability and scope.
R1.4. System real and reactive reserves (actual versus required).	<i>Balloted Language</i>	N/A	N/A	N/A	The Reliability Coordinator failed to monitor system real and reactive reserves (actual versus required).
R1.5. Capacity and energy adequacy conditions.	<i>Balloted Language</i>	N/A	N/A	N/A	The Reliability Coordinator failed to monitor capacity and energy adequacy conditions.
R1.6. Current ACE for all its Balancing Authorities.	<i>Balloted Language</i>	N/A	N/A	N/A	The Reliability Coordinator failed to monitor current ACE for all its Balancing Authorities.
R1.7. Current local or Transmission Loading Relief procedures in effect.	<i>Balloted Language</i>	N/A	N/A	N/A	The Reliability Coordinator failed to monitor current local or Transmission Loading Relief procedures in effect.
R1.8. Planned generation dispatches.	<i>Balloted Language</i>	N/A	N/A	N/A	The Reliability Coordinator failed to monitor planned generation dispatches.
R1.9. Planned transmission or generation outages.	<i>Balloted Language</i>	N/A	N/A	N/A	The Reliability Coordinator failed to monitor planned transmission or generation outages.
R1.10. Contingency events.	<i>Balloted Language</i>	N/A	N/A	N/A	The Reliability Coordinator failed to

Staff Proposed Changes to Previously Balloted Violation Severity Levels (IRO)

IRO-005-2 - Reliability Coordination – Current Day Operations					
	VSL	Lower	Moderate	High	Severe
					monitor contingency events.
R1	<i>Proposed Change</i>	The Reliability Coordinator failed to monitor one (1) of the elements listed in R1.1 through R1.10.	The Reliability Coordinator failed to monitor two (2) of the elements listed in R1.1 through R1.10.	The Reliability Coordinator failed to monitor three (3) of the elements listed in R1.1 through R1.10.	The Reliability Coordinator failed to monitor more than three (3) of the elements listed in R1.1 through R1.10.
Explanation – Consistent with Guidelines filed with FERC on August 11, 2009, NERC incorporated the sub-requirements into the Main Requirement VSL so that compliance is based on meeting criteria specified in components.					
R8. Each Reliability Coordinator shall monitor system frequency and its Balancing Authorities' performance and direct any necessary rebalancing to return to CPS and DCS compliance. The Transmission Operators and Balancing Authorities shall utilize all resources, including firm load shedding, as directed by its Reliability Coordinator to relieve the emergent condition.	<i>Balloted Language</i>	N/A	N/A	The Reliability Coordinator monitored system frequency and its Balancing Authorities' performance but failed to direct any necessary rebalancing to return to CPS and DCS compliance.	The Reliability Coordinator failed to monitor system frequency and its Balancing Authorities' performance and direct any necessary rebalancing to return to CPS and DCS compliance or the responsible entity failed to utilize all resources, including firm load shedding, as directed by its Reliability Coordinator to relieve the emergent condition.
R8	<i>Proposed Change</i>	N/A	N/A	The Reliability Coordinator monitored system frequency and its Balancing Authorities' performance but failed to direct any necessary rebalancing to return to CPS and DCS compliance.	The Reliability Coordinator failed to monitor system frequency and its Balancing Authorities' performance and direct any necessary rebalancing to return to CPS and DCS compliance. OR The responsible entity failed to utilize all

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IRO-005-2 - Reliability Coordination – Current Day Operations					
	<i>VSL</i>	<i>Lower</i>	<i>Moderate</i>	<i>High</i>	<i>Severe</i>
					resources, including firm load shedding, as directed by its Reliability Coordinator to relieve the emergent condition.
Explanation – The VSLs were modified for clarity and consistency with other standards and VSLs.					
R9. The Reliability Coordinator shall coordinate with Transmission Operators, Balancing Authorities, and Generator Operators as needed to develop and implement action plans to mitigate potential or actual SOL, IROL, CPS, or DCS violations. The Reliability Coordinator shall coordinate pending generation and transmission maintenance outages with Transmission Operators, Balancing Authorities, and Generator Operators as needed in both the real-time and next-day reliability analysis timeframes.	<i>Balloted Language</i>	N/A	The Reliability Coordinator coordinated with Transmission Operators, Balancing Authorities, and Generator Operators, as needed, to develop action plans to mitigate potential or actual SOL, IROL, CPS, or DCS violations but failed to implement said plans, or the Reliability Coordinator coordinated pending generation and transmission maintenance outages with Transmission Operators, Balancing Authorities, and Generator Operators as needed in the real-time reliability analysis timeframe but failed to coordinate pending generation and transmission maintenance outages in the next-day reliability analysis timeframe.	The Reliability Coordinator failed to coordinate with Transmission Operators, Balancing Authorities, and Generator Operators as needed to develop and implement action plans to mitigate potential or actual SOL, IROL, CPS, or DCS violations, or the Reliability Coordinator failed to coordinate pending generation and transmission maintenance outages with Transmission Operators, Balancing Authorities, and Generator Operators as needed in both the real-time and next-day reliability analysis timeframes.	The Reliability Coordinator failed to coordinate with Transmission Operators, Balancing Authorities, and Generator Operators as needed to develop and implement action plans to mitigate potential or actual SOL, IROL, CPS, or DCS violations and the Reliability Coordinator failed to coordinate pending generation and transmission maintenance outages with Transmission Operators, Balancing Authorities, and Generator Operators as needed in both the real-time and next-day reliability analysis timeframes.
R9	<i>Proposed</i>	N/A	The Reliability Coordinator coordinated	The Reliability Coordinator failed to	The Reliability Coordinator failed to

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IRO-005-2 - Reliability Coordination – Current Day Operations					
	<i>VSL</i>	<i>Lower</i>	<i>Moderate</i>	<i>High</i>	<i>Severe</i>
	<i>Change</i>		<p>with Transmission Operators, Balancing Authorities, and Generator Operators, as needed, to develop action plans to mitigate potential or actual SOL, IROL, CPS, or DCS violations but failed to implement said plans.</p> <p>OR</p> <p>The Reliability Coordinator coordinated pending generation and transmission maintenance outages with Transmission Operators, Balancing Authorities, and Generator Operators as needed in the real-time reliability analysis timeframe but failed to coordinate pending generation and transmission maintenance outages in the next-day reliability analysis timeframe.</p>	<p>coordinate with Transmission Operators, Balancing Authorities, and Generator Operators as needed to develop and implement action plans to mitigate potential or actual SOL, IROL, CPS, or DCS violations.</p> <p>OR</p> <p>The Reliability Coordinator failed to coordinate pending generation and transmission maintenance outages with Transmission Operators, Balancing Authorities, and Generator Operators as needed in both the real-time and next-day reliability analysis timeframes.</p>	<p>coordinate with Transmission Operators, Balancing Authorities, and Generator Operators as needed to develop and implement action plans to mitigate potential or actual SOL, IROL, CPS, or DCS violations.</p> <p>AND</p> <p>The Reliability Coordinator failed to coordinate pending generation and transmission maintenance outages with Transmission Operators, Balancing Authorities, and Generator Operators as needed in both the real-time and next-day reliability analysis timeframes.</p>
Explanation – The VSLs were modified for clarity and consistency with other standards and VSLs.					

IRO-005-3 – Reliability Coordination – Current Day Operations					
	<i>VSL</i>	<i>Lower</i>	<i>Moderate</i>	<i>High</i>	<i>Severe</i>
R1. Each Reliability Coordinator shall monitor its Reliability Coordinator Area parameters, including but not limited to the following:	<i>Balloted Language</i>	The Reliability Coordinator failed to monitor one (1) of the elements listed in IRO-005-2 R1.1 through R1.10.	The Reliability Coordinator failed to monitor two (2) of the elements listed in IRO-005-2 R1.1 through R1.10.	The Reliability Coordinator failed to monitor three (3) of the elements listed in IRO-005-2 R1.1 through R1.10.	The Reliability Coordinator failed to monitor more than three (3) of the elements listed in IRO-005-2 R1.1 through R1.10.
R1.1. Current status of Bulk Electric System elements (transmission or generation including critical auxiliaries such as Automatic Voltage Regulators and Special Protection Systems) and system loading.	<i>Balloted Language</i>	The Reliability Coordinator failed to monitor the current status of Bulk Electric System elements (transmission or generation including critical auxiliaries such as Automatic Voltage Regulators and Special Protection Systems) and system loading.N/A	N/A	N/A	N/A
R1.2. Current pre-contingency element conditions (voltage, thermal, or stability), including any applicable mitigation plans to alleviate SOL or IROL violations, including the plan's viability and scope.	<i>Balloted Language</i>	The Reliability Coordinator failed to monitor current precontingency element conditions (voltage, thermal, or stability), including any applicable mitigation plans to alleviate SOL or IROL violations, including the plan's viability and scope.	N/A	N/A	N/A
R1.3. Current post-contingency element conditions (voltage, thermal, or stability), including any applicable mitigation plans to alleviate SOL or IROL violations, including the plan's viability and scope.	<i>Balloted Language</i>	The Reliability Coordinator failed to monitor current postcontingency element conditions (voltage, thermal, or stability), including any applicable mitigation plans to	N/A	N/A	N/A

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IRO-005-3 – Reliability Coordination – Current Day Operations					
	<i>VSL</i>	<i>Lower</i>	<i>Moderate</i>	<i>High</i>	<i>Severe</i>
		alleviate SOL or IROL violations, including the plan's viability and scope.			
R1.4. System real and reactive reserves (actual versus required).	<i>Balloted Language</i>	The Reliability Coordinator failed to monitor system real and reactive reserves (actual versus required).	N/A	N/A	N/A
R1.5. Capacity and energy adequacy conditions.	<i>Balloted Language</i>	The Reliability Coordinator failed to monitor capacity and energy adequacy conditions.	N/A	N/A	N/A
R1.6. Current ACE for all its Balancing Authorities.	<i>Balloted Language</i>	The Reliability Coordinator failed to monitor current ACE for all its Balancing Authorities.	N/A	N/A	N/A
R1.7. Current local or Transmission Loading Relief procedures in effect.	<i>Balloted Language</i>	The Reliability Coordinator failed to monitor current local or Transmission Loading Relief procedures in effect.	N/A	N/A	N/A
R1.8. Planned generation dispatches.	<i>Balloted Language</i>	The Reliability Coordinator failed to monitor planned generation dispatches.	N/A	N/A	N/A
R1.9. Planned transmission or generation outages.	<i>Balloted Language</i>	The Reliability Coordinator failed to monitor planned transmission or generation outages.	N/A	N/A	N/A
R1.10. Contingency events.	<i>Balloted Language</i>	The Reliability Coordinator failed to monitor contingency	N/A	N/A	N/A

Staff Proposed Changes to Previously Balloted Violation Severity Levels (IRO)

IRO-005-3 – Reliability Coordination – Current Day Operations					
	VSL	Lower	Moderate	High	Severe
		events.			
R1	<i>Proposed Change</i>	The Reliability Coordinator failed to monitor one (1) of the elements listed in R1.1 through R1.10.	The Reliability Coordinator failed to monitor two (2) of the elements listed in R1.1 through R1.10.	The Reliability Coordinator failed to monitor three (3) of the elements listed in R1.1 through R1.10.	The Reliability Coordinator failed to monitor more than three (3) of the elements listed in R1.1 through R1.10.
Explanation – Consistent with Guidelines filed with FERC on August 11, 2009, NERC incorporated the sub-requirements into the Main Requirement VSL so that compliance is based on meeting criteria specified in components.					
R5. Each Reliability Coordinator shall monitor system frequency and its Balancing Authorities' performance and direct any necessary rebalancing to return to CPS and DCS compliance. The Transmission Operators and Balancing Authorities shall utilize all resources, including firm load shedding, as directed by its Reliability Coordinator to relieve the emergent condition.	<i>Balloted Language</i>	N/A	N/A	The Reliability Coordinator monitored system frequency and its Balancing Authorities' performance but failed to direct any necessary rebalancing to return to CPS and DCS compliance.	The Reliability Coordinator failed to monitor system frequency and its Balancing Authorities' performance and direct any necessary rebalancing to return to CPS and DCS compliance or the responsible entity failed to utilize all resources, including firm load shedding, as directed by its Reliability Coordinator to relieve the emergent condition.
R5	<i>Proposed Change</i>	N/A	N/A	The Reliability Coordinator monitored system frequency and its Balancing Authorities' performance but failed to direct any necessary rebalancing to return to CPS and DCS compliance.	The Reliability Coordinator failed to monitor system frequency and its Balancing Authorities' performance and direct any necessary rebalancing to return to CPS and DCS compliance. OR

Staff Proposed Changes to Previously Balloted Violation Severity Levels (IRO)

IRO-005-3 – Reliability Coordination – Current Day Operations					
	<i>VSL</i>	<i>Lower</i>	<i>Moderate</i>	<i>High</i>	<i>Severe</i>
					The responsible entity failed to utilize all resources, including firm load shedding, as directed by its Reliability Coordinator to relieve the emergent condition.
Explanation – Modified for clarity and consistency with other standards and VSLs.					
R6. The Reliability Coordinator shall coordinate with Transmission Operators, Balancing Authorities, and Generator Operators as needed to develop and implement action plans to mitigate potential or actual SOL, CPS, or DCS violations. The Reliability Coordinator shall coordinate pending generation and transmission maintenance outages with Transmission Operators, Balancing Authorities, and Generator Operators as needed in both the real time and next-day reliability analysis timeframes.	<i>Balloted Language</i>	N/A	The Reliability Coordinator coordinated with Transmission Operators, Balancing Authorities, and Generator Operators, as needed, to develop action plans to mitigate potential or actual SOL, CPS, or DCS violations but failed to implement said plans, or the Reliability Coordinator coordinated pending generation and transmission maintenance outages with Transmission Operators, Balancing Authorities, and Generator Operators as needed in the real-time reliability analysis timeframe but failed to coordinate pending generation and transmission maintenance outages in the next-day reliability analysis timeframe.	The Reliability Coordinator failed to coordinate with Transmission Operators, Balancing Authorities, and Generator Operators as needed to develop and implement action plans to mitigate potential or actual SOL, CPS, or DCS violations, or the Reliability Coordinator failed to coordinate pending generation and transmission maintenance outages with Transmission Operators, Balancing Authorities, and Generator Operators as needed in both the real-time and next-day reliability analysis timeframes.	The Reliability Coordinator failed to coordinate with Transmission Operators, Balancing Authorities, and Generator Operators as needed to develop and implement action plans to mitigate potential or actual SOL, CPS, or DCS violations and the Reliability Coordinator failed to coordinate pending generation and transmission maintenance outages with Transmission Operators, Balancing Authorities, and Generator Operators as needed in both the real-time and next-day reliability analysis timeframes.

Staff Proposed Changes to Previously Balloted Violation Severity Levels (IRO)

IRO-005-3 – Reliability Coordination – Current Day Operations					
	<i>VSL</i>	<i>Lower</i>	<i>Moderate</i>	<i>High</i>	<i>Severe</i>
R6	<i>Proposed Change</i>	N/A	<p>The Reliability Coordinator coordinated with Transmission Operators, Balancing Authorities, and Generator Operators, as needed, to develop action plans to mitigate potential or actual SOL, CPS, or DCS violations but failed to implement said plans,</p> <p>OR</p> <p>The Reliability Coordinator coordinated pending generation and transmission maintenance outages with Transmission Operators, Balancing Authorities, and Generator Operators as needed in the real-time reliability analysis timeframe but failed to coordinate pending generation and transmission maintenance outages in the next-day reliability analysis timeframe.</p>	<p>The Reliability Coordinator failed to coordinate with Transmission Operators, Balancing Authorities, and Generator Operators as needed to develop and implement action plans to mitigate potential or actual SOL, CPS, or DCS violations</p> <p>OR</p> <p>The Reliability Coordinator failed to coordinate pending generation and transmission maintenance outages with Transmission Operators, Balancing Authorities, and Generator Operators as needed in both the real-time and next-day reliability analysis timeframes.</p>	<p>The Reliability Coordinator failed to coordinate with Transmission Operators, Balancing Authorities, and Generator Operators as needed to develop and implement action plans to mitigate potential or actual SOL, CPS, or DCS violations and the Reliability Coordinator failed to coordinate pending generation and transmission maintenance outages with Transmission Operators, Balancing Authorities, and Generator Operators as needed in both the real-time and next-day reliability analysis timeframes.</p>
Explanation – Modified for clarity and consistency with other standards and VSLs.					
R12. Each Reliability Coordinator who foresees a transmission problem (such as an SOL or IROL violation, loss	<i>Balloted Language</i>	N/A	The Reliability Coordinator failed to notify all impacted Transmission Operators,	N/A	The Reliability Coordinator who foresaw a transmission problem (such as an SOL or IROL

Staff Proposed Changes to Previously Balloted Violation Severity Levels (IRO)

IRO-005-3 – Reliability Coordination – Current Day Operations					
	<i>VSL</i>	<i>Lower</i>	<i>Moderate</i>	<i>High</i>	<i>Severe</i>
	of reactive reserves, etc.) within its Reliability Coordinator Area shall issue an alert to all impacted Transmission Operators and Balancing Authorities in its Reliability Coordinator Area without delay. The receiving Reliability Coordinator shall disseminate this information to its impacted Transmission Operators and Balancing Authorities. The Reliability Coordinator shall notify all impacted Transmission Operators, Balancing Authorities, when the transmission problem has been mitigated.		Balancing Authorities, when a transmission problem had been mitigated.		violation, loss of reactive reserves, etc.) within its Reliability Coordinator Area failed to issue an alert to all impacted Transmission Operators and Balancing Authorities in its Reliability Coordinator Area, or the receiving Reliability Coordinator failed to disseminate this information to its impacted Transmission Operators and Balancing Authorities.
R12	<i>Proposed Change</i>	N/A	The Reliability Coordinator failed to notify all impacted Transmission Operators, Balancing Authorities, when a transmission problem had been mitigated.	N/A	The Reliability Coordinator who foresaw a transmission problem (such as an SOL or IROL violation, loss of reactive reserves, etc.) within its Reliability Coordinator Area failed to issue an alert to all impacted Transmission Operators and Balancing Authorities in its Reliability Coordinator Area OR The receiving Reliability Coordinator failed to disseminate this information to its impacted Transmission

Staff Proposed Changes to Previously Balloted Violation Severity Levels (IRO)

IRO-005-3 – Reliability Coordination – Current Day Operations					
	<i>VSL</i>	<i>Lower</i>	<i>Moderate</i>	<i>High</i>	<i>Severe</i>
					Operators and Balancing Authorities.
Explanation – Modified for clarity and consistency with other standards and VSLs.					

IRO-006-3 - Reliability Coordination – Transmission Loading Relief					
	<i>VSL</i>	<i>Lower</i>	<i>Moderate</i>	<i>High</i>	<i>Severe</i>
R2. A Reliability Coordinator experiencing a potential or actual SOL or IROL violation within its Reliability Coordinator Area shall, at its discretion, select from either a “local” (Regional, Interregional, or subregional) transmission loading relief procedure or an Interconnection-wide procedure.	<i>Balloted Language</i>	N/A	N/A	N/A	The Reliability Coordinator failed to take appropriate actions in accordance with established policies, procedures, authority, and expectations to relieve transmission loading.
R2.1. The Interconnection-wide Transmission Loading Relief (TLR) procedure for use in the Eastern Interconnection is provided in Attachment 1-IRO-006-0.	<i>Balloted Language</i>	N/A	N/A	N/A	While attempting to mitigate an existing IROL violation in the Eastern Interconnection, the Reliability Coordinator applied TLR as the sole remedy for an existing IROL violation.
R2.2. The equivalent Interconnection-wide transmission loading relief procedure for use in the Western Interconnection is the “WSCC Unscheduled Flow Mitigation Plan,” provided at: http://www.wecc.biz/documents/library/UFAS/UFAS_mitigation_plan_rev_2001-clean_8-8-03.pdf .	<i>Balloted Language</i>	N/A	N/A	N/A	While attempting to mitigate an existing constraint in the Western Interconnection using the “WSCC Unscheduled Flow Mitigation Plan”, the Reliability Coordinator did not follow the procedure correctly.
R2.3. The Interconnection-wide transmission loading relief procedure for use in ERCOT is provided as Section 7 of the ERCOT Protocols, posted at: http://www.ercot.com/mktrules/protocols/library/2007/02/Februar	<i>Balloted Language</i>	N/A	N/A	N/A	While attempting to mitigate an existing constraint in ERCOT using Section 7 of the ERCOT Protocols, the Reliability Coordinator did not follow the procedure

Staff Proposed Changes to Previously Balloted Violation Severity Levels (IRO)

IRO-006-3 - Reliability Coordination – Transmission Loading Relief					
	<i>VSL</i>	<i>Lower</i>	<i>Moderate</i>	<i>High</i>	<i>Severe</i>
y_1,_2007_Protocols.pdf.					correctly.
R2.	<i>Proposed Change</i>	N/A	N/A	N/A	The Reliability Coordinator experiencing a potential or actual SOL or IROL violation within its Reliability Coordinator Area failed to select from either a “local” (Regional, Interregional, or subregional) transmission loading relief procedure or an Interconnection-wide procedure.
Explanation – The VSLs were modified to be consistent with FERC Guideline 3.					
R3. The Reliability Coordinator may use local transmission loading relief or congestion management procedures, provided the Transmission Operator experiencing the potential or actual SOL or IROL violation is a party to those procedures.	<i>Balloted Language</i>				
R3	<i>Proposed Change</i>	N/A	N/A	N/A	The Reliability Coordinator used a local transmission loading relief or congestion management procedure when the Transmission Operator experiencing the potential or actual SOL or IROL violation was not a party to said procedure.
Explanation – The VSL was modified for clarity and consistency with other standards and VSLs.					

Staff Proposed Changes to Previously Balloted Violation Severity Levels (IRO)

IRO-006-3 - Reliability Coordination – Transmission Loading Relief					
	<i>VSL</i>	<i>Lower</i>	<i>Moderate</i>	<i>High</i>	<i>Severe</i>
R4. A Reliability Coordinator may implement a local transmission loading relief or congestion management procedure simultaneously with an Interconnection-wide procedure. However, the Reliability Coordinator shall follow the curtailments as directed by the Interconnection-wide procedure. A Reliability Coordinator desiring to use a local procedure as a substitute for curtailments as directed by the Interconnection-wide procedure shall have such use approved by the NERC Operating Committee.	<i>Balloted Language</i>				
R4	<i>Proposed Change</i>	N/A	N/A	A Reliability Coordinator used a local procedure as a substitute for curtailments as directed by an Interconnection-wide procedure without having said procedure approved for use by the NERC Operating Committee.	A Reliability Coordinator implemented a local transmission loading relief or congestion management procedure simultaneously with an Interconnection-wide procedure and failed to follow the curtailments as directed by the Interconnection-wide procedure.
Explanation – The VSL was modified for clarity and consistency with other standards and VSLs.					
R6. During the implementation of relief procedures, and up to the point that emergency action is necessary, Reliability Coordinators and Balancing Authorities shall comply with	<i>Balloted Language</i>				

Staff Proposed Changes to Previously Balloted Violation Severity Levels (IRO)

IRO-006-3 - Reliability Coordination – Transmission Loading Relief					
	<i>VSL</i>	<i>Lower</i>	<i>Moderate</i>	<i>High</i>	<i>Severe</i>
interchange scheduling standards INT-001 through INT-004.					
R6	<i>Proposed Change</i>	The responsible entity failed to comply with 5% or less of the requirements in INT-001 through INT-004 during the implementation of the relief procedures up to the point that emergency action was necessary.	The responsible entity failed to comply with more than 5% up to (and including) 10% of the requirements in INT-001 through INT-004 during the implementation of the relief procedures up to the point that emergency action was necessary.	The responsible entity failed to comply with more than 10% up to (and including) 15% of the requirements in INT-001 through INT-004 during the implementation of the relief procedures up to the point that emergency action was necessary.	The responsible entity failed to comply with more than 15% of the requirements in INT-001 through INT-004 during the implementation of the relief procedures up to the point that emergency action was necessary.
Explanation – The VSLs were modified for clarity and consistency with other standards and VSLs.					

IRO-006-4.1 – Reliability Coordination – Transmission Loading Relief					
	<i>VSL</i>	<i>Lower</i>	<i>Moderate</i>	<i>High</i>	<i>Severe</i>
R1. A Reliability Coordinator experiencing a potential or actual SOL or IROL violation within its Reliability Coordinator Area shall, with its authority and at its discretion, select one or more procedures to provide transmission loading relief. These procedures can be a “local” (regional, interregional, or sub-regional) transmission loading relief procedure or one of the following Interconnection-wide procedures:	<i>Balloted Language</i>	For each TLR in the Eastern Interconnection, the Reliability Coordinator violates one (1) requirement of the applicable Interconnection-wide procedure	For each TLR in the Eastern Interconnection, the Reliability Coordinator violated two (2) to three (3) requirements of the applicable Interconnection-wide procedure	For each TLR in the Eastern Interconnection, the applicable Reliability Coordinator violated four (4) to five (5) requirements of the applicable Interconnection-wide procedure	For each TLR in the Eastern Interconnection, the Reliability Coordinator violated six (6) or more of the requirements of the applicable Interconnection-wide procedure.
R1.1. The Interconnection-wide Transmission Loading Relief (TLR) procedure for use in the Eastern Interconnection provided in Attachment 1-IRO-006-4. The TLR procedure alone is an inappropriate and ineffective tool to mitigate an IROL violation due to the time required to implement the procedure. Other acceptable and more effective procedures to mitigate actual IROL violations include: reconfiguration, redispach, or load shedding.	<i>Balloted Language</i>				While attempting to mitigate an existing IROL violation in the Eastern Interconnection, the Reliability Coordinator applied TLR as the sole remedy for an existing IROL violation.
R1.2. The Interconnection-wide transmission loading relief procedure for use in the Western Interconnection is WECC-IRO-STD-006-0 provided at:	<i>Balloted Language</i>				While attempting to mitigate an existing constraint in the Western Interconnection using the “WSCC Unscheduled Flow Mitigation Plan”, the

Staff Proposed Changes to Previously Balloted Violation Severity Levels (IRO)

IRO-006-4.1 – Reliability Coordination – Transmission Loading Relief					
	<i>VSL</i>	<i>Lower</i>	<i>Moderate</i>	<i>High</i>	<i>Severe</i>
ftp://www.nerc.com/pub/sys/all_updl/standards/rrs/IRO-STD-006-0_17Jan07.pdf .					Reliability Coordinator did not follow the procedure correctly.
R1.3. The Interconnection-wide transmission loading relief procedure for use in ERCOT is provided as Section 7 of the ERCOT Protocols, posted at: http://www.ercot.com/mktrules/protocols/current.html	<i>Balloted Language</i>				While attempting to mitigate an existing constraint in ERCOT using Section 7 of the ERCOT Protocols, the Reliability Coordinator did not follow the procedure correctly.
R1	<i>Proposed Change</i>	For each TLR in the Eastern Interconnection, the Reliability Coordinator violates one (1) requirement of the applicable Interconnection-wide procedure	For each TLR in the Eastern Interconnection, the Reliability Coordinator violated two (2) to three (3) requirements of the applicable Interconnection-wide procedure	For each TLR in the Eastern Interconnection, the applicable Reliability Coordinator violated four (4) to five (5) requirements of the applicable Interconnection-wide procedure	For each TLR in the Eastern Interconnection, the Reliability Coordinator violated six (6) or more of the requirements of the applicable Interconnection-wide procedure OR While attempting to mitigate an existing IROL violation in the Eastern Interconnection, the Reliability Coordinator applied TLR as the sole remedy for an existing IROL violation. OR While attempting to mitigate an existing constraint in the Western Interconnection using the “WSCC Unscheduled Flow Mitigation Plan”, the

Staff Proposed Changes to Previously Balloted Violation Severity Levels (IRO)

IRO-006-4.1 – Reliability Coordination – Transmission Loading Relief					
	<i>VSL</i>	<i>Lower</i>	<i>Moderate</i>	<i>High</i>	<i>Severe</i>
					Reliability Coordinator did not follow the procedure correctly OR While attempting to mitigate an existing constraint in ERCOT using Section 7 of the ERCOT Protocols, the Reliability Coordinator did not follow the procedure correctly
Explanation – Consistent with Guidelines filed with FERC on August 11, 2009, NERC incorporated the sub-requirements into the Main Requirement VSL so that compliance is based on the number of missing sub-requirements.					
R4. When Interconnection-wide procedures are implemented to curtail Interchange Transactions that cross an Interconnection boundary, each Reliability Coordinator shall comply with the provisions of the Interconnection-wide procedure.	<i>Balloted Language</i>	When requested to curtail an Interchange Transaction that crosses an Interconnection boundary utilizing an Interconnection-wide procedure, the responding Reliability Coordinator did not comply with the provisions of the Interconnection-wide procedure as requested by the initiating Reliability Coordinator	N/A	N/A	N/A
R4	<i>Proposed Change</i>	N/A	N/A	N/A	When requested to curtail an Interchange Transaction that crosses an Interconnection boundary utilizing an Interconnection-wide

Staff Proposed Changes to Previously Balloted Violation Severity Levels (IRO)

IRO-006-4.1 – Reliability Coordination – Transmission Loading Relief					
	<i>VSL</i>	<i>Lower</i>	<i>Moderate</i>	<i>High</i>	<i>Severe</i>
					procedure, the responding Reliability Coordinator did not comply with the provisions of the Interconnection-wide procedure as requested by the initiating Reliability Coordinator
Explanation – Modified to be consistent with FERC Guideline 2.					
R5. During the implementation of relief procedures, and up to the point that emergency action is necessary, Reliability Coordinators and Balancing Authorities shall comply with applicable Interchange scheduling standards.	<i>Balloted Language</i>	The Reliability Coordinators or Balancing Authorities did not comply with applicable Interchange scheduling standards during the implementation of the relief procedures, up to the point emergency action is necessary	N/A	N/A	N/A
R5	<i>Proposed Change</i>	N/A	N/A	N/A	The Reliability Coordinators or Balancing Authorities did not comply with applicable Interchange scheduling standards during the implementation of the relief procedures, up to the point emergency action is necessary
Explanation – Modified to be consistent with FERC Guideline 2.					

IRO-008-1 – Reliability Coordinator Operational Analyses and Real-time Assessments					
	<i>VSL</i>	<i>Lower</i>	<i>Moderate</i>	<i>High</i>	<i>Severe</i>
R1. Each Reliability Coordinator shall perform an Operational Planning Analysis to assess whether the planned operations for the next day within its Wide Area, will exceed any of its Interconnection Reliability Operating Limits (IROLs) during anticipated normal and Contingency event conditions.	<i>Balloted Language</i>	Performed an Operational Planning Analysis that covers all aspects of the requirement for all except one of 30 days. (R1)	Performed an Operational Planning Analysis that covers all aspects of the requirement for all except two of 30 days. (R1)	Performed an Operational Planning Analysis that covers all aspects of the requirement for all except three of 30 days. (R1)	Missed performing an Operational Planning Analysis that covers all aspects of the requirement for four or more of 30 days. (R1)
R1	<i>Proposed Change</i>	N/A	N/A	N/A	The Reliability Coordinator did not perform a day-ahead Operational Planning Analysis that covered all aspects of the requirement.
Explanation – Modified to be consistent with FERC Guideline 4.					
R2. Each Reliability Coordinator shall perform a Real-Time Assessment at least once every 30 minutes to determine if its Wide Area is exceeding any IROLs or is expected to exceed any IROLs.	<i>Balloted Language</i>	For any sample 24 hour period within the 30 day retention period, a Real-time Assessment was not conducted for one 30-minute period. within that 24-hour period (R2)	For any sample 24 hour period within the 30 day retention period, Real-time Assessments were not conducted for two 30-minute periods within that 24-hour period (R2)	For any sample 24 hour period within the 30 day retention period, Real-time Assessments were not conducted for three 30-minute periods within that 24-hour period (R2)	For any sample 24 hour period within the 30 day retention period, Real-time Assessments were not conducted for more than three 30-minute periods within that 24-hour period (R2)
R2	<i>Proposed Change</i>	N/A	N/A	N/A	The Reliability Coordinator did not conduct a Real-time Assessment at least once every 30 minutes as described in the requirement.
Explanation – Modified to be consistent with FERC Guideline 4.					

Staff Proposed Changes to Previously Balloted Violation Severity Levels (IRO)

IRO-008-1 – Reliability Coordinator Operational Analyses and Real-time Assessments					
	<i>VSL</i>	<i>Lower</i>	<i>Moderate</i>	<i>High</i>	<i>Severe</i>
R3. When a Reliability Coordinator determines that the results of an Operational Planning Analysis or Real-Time Assessment indicates the need for specific operational actions to prevent or mitigate an instance of exceeding an IROL, the Reliability Coordinator shall share its results with those entities that are expected to take those actions.	<i>Balloted Language</i>		Shared the results with some but not all of the entities that were required to take action (R3)		Did not share the results of its analyses or assessments with any of the entities that were required to take action (R3).
R3	<i>Proposed Change</i>	N/A	The Reliability Coordinator shared the results with some but not all of the entities that were required to take action.	N/A	The Reliability Coordinator shared the results of its analyses or assessments with none of the entities that were required to take action.
Explanation – Modified for clarity and consistency with other standards and VSLs.					

IRO-009-1 - Reliability Coordinator Actions to Operate Within IROLs					
	<i>VSL</i>	<i>Lower</i>	<i>Moderate</i>	<i>High</i>	<i>Severe</i>
R1. For each IROL (in its Reliability Coordinator Area) that the Reliability Coordinator identifies one or more days prior to the current day, the Reliability Coordinator shall have one or more Operating Processes, Procedures, or Plans that identify actions it shall take or actions it shall direct others to take (up to and including load shedding) that can be implemented in time to prevent exceeding those IROLs.	<i>Balloted Language</i>				An IROL in its Reliability Coordinator Area was identified one or more days in advance and the Reliability Coordinator does not have an Operating Process, Procedure, or Plan that identifies actions to prevent exceeding that IROL. (R1)
R1	<i>Proposed Change</i>	N/A	N/A	N/A	The Reliability Coordinator identified an IROL in its Reliability Coordinator Area one or more days in advance, but the Reliability Coordinator does not have an Operating Process, Procedure, or Plan that identifies actions to prevent exceeding that IROL.
Explanation – Modified for clarity and consistency with other standards and VSLs.					
R2. For each IROL (in its Reliability Coordinator Area) that the Reliability Coordinator identifies one or more days prior to the current day, the Reliability Coordinator shall have one or more Operating Processes, Procedures, or Plans that	<i>Balloted Language</i>				An IROL in its Reliability Coordinator Area was identified one or more days in advance and the Reliability Coordinator does not have an Operating Process,

Staff Proposed Changes to Previously Balloted Violation Severity Levels (IRO)

IRO-009-1 - Reliability Coordinator Actions to Operate Within IROLs					
	<i>VSL</i>	<i>Lower</i>	<i>Moderate</i>	<i>High</i>	<i>Severe</i>
identify actions it shall take or actions it shall direct others to take (up to and including load shedding) to mitigate the magnitude and duration of exceeding that IROL such that the IROL is relieved within the IROL's Tv.					Procedure, or Plan that identifies actions to mitigate exceeding that IROL within the IROL's Tv. (R2)
R2	<i>Proposed Change</i>	N/A	N/A	N/A	The Reliability Coordinator identified an IROL in its Reliability Coordinator Area one or more days in advance, but the Reliability Coordinator does not have an Operating Process, Procedure, or Plan that identifies actions to mitigate the magnitude and duration of exceeding that IROL within the IROL's Tv.
Explanation – Modified to be consistent with FERC Guideline 3.					
R3. When an assessment of actual or expected system conditions predicts that an IROL in its Reliability Coordinator Area will be exceeded, the Reliability Coordinator shall implement one or more Operating Processes, Procedures or Plans (not limited to the Operating Processes, Procedures, or Plans developed for Requirements R1) to prevent exceeding that IROL.	<i>Balloted Language</i>				An assessment of actual or expected system conditions predicted that an IROL in the Reliability Coordinator's Area would be exceeded, but no Operating Processes, Procedures, or Plans were implemented. (R3)

Staff Proposed Changes to Previously Balloted Violation Severity Levels (IRO)

IRO-009-1 - Reliability Coordinator Actions to Operate Within IROLs					
	<i>VSL</i>	<i>Lower</i>	<i>Moderate</i>	<i>High</i>	<i>Severe</i>
R3	<i>Proposed Change</i>	N/A	N/A	N/A	An assessment of actual or expected system conditions predicted that an IROL in the Reliability Coordinator's Area would be exceeded, but the Reliability Coordinator did not implement any Operating Processes, Procedures, or Plans to prevent exceeding that IROL.
Explanation – Modified to be consistent with FERC Guideline 3.					
R4. When actual system conditions show that there is an instance of exceeding an IROL in its Reliability Coordinator Area, the Reliability Coordinator shall, without delay, act or direct others to act to mitigate the magnitude and duration of the instance of exceeding that IROL within the IROL's Tv.	<i>Balloted Language</i>			Actual system conditions showed that there was an instance of exceeding an IROL in its Reliability Coordinator Area, and there was a delay of five minutes or more before acting or directing others to act to mitigate the magnitude and duration of the instance of exceeding that IROL, however the IROL was mitigated within the IROL Tv. (R4)	Actual system conditions showed that there was an instance of exceeding an IROL in its Reliability Coordinator Area, and that IROL was not resolved within the IROL's Tv. (R4)
R4	<i>Proposed Change</i>	N/A	N/A	Actual system conditions showed that there was an instance of exceeding an IROL in its Reliability Coordinator Area, and the Reliability Coordinator delayed acting or directing others to act to	Actual system conditions showed that there was an instance of exceeding an IROL in its Reliability Coordinator Area, and the Reliability Coordinator did not act

Staff Proposed Changes to Previously Balloted Violation Severity Levels (IRO)

IRO-009-1 - Reliability Coordinator Actions to Operate Within IROLs					
	<i>VSL</i>	<i>Lower</i>	<i>Moderate</i>	<i>High</i>	<i>Severe</i>
				mitigate the magnitude and duration of the instance of exceeding that IROL; however the IROL was mitigated within the IROL Tv. (R4)	or direct others to act such that the that IROL was mitigated within the IROL's Tv. (R4)
Explanation – Modified to be consistent with FERC Guideline 3.					
R5. If unanimity cannot be reached on the value for an IROL or its Tv, each Reliability Coordinator that monitors that Facility (or group of Facilities) shall, without delay, use the most conservative of the values (the value with the least impact on reliability) under consideration.	<i>Balloted Language</i>	N/A	N/A	N/A	There was a disagreement on the value of the IROL or its Tv and the most conservative limit under consideration was not used. (R5)
R5	<i>Proposed Change</i>	N/A	N/A	N/A	When there was a disagreement on the value of the IROL or its Tv, the Reliability Coordinator did not use the most conservative limit under consideration. (R5)
Explanation – Modified for clarity and consistency with other standards and VSLs.					

IRO-010-1 - Reliability Coordinator Data Specification and Collection					
	<i>VSL</i>	<i>Lower</i>	<i>Moderate</i>	<i>High</i>	<i>Severe</i>
R1. The Reliability Coordinator shall have a documented specification for data and information to build and maintain models to support Real-time monitoring, Operational Planning Analyses, and Real-time Assessments of its Reliability Coordinator Area to prevent instability, uncontrolled separation, and cascading outages. The specification shall include the following:	<i>Balloted Language</i>	Data specification is complete with the following exception: Missing the mutually agreeable format. (R1.2)	Data specification is complete with the following exception – no process for data provision when automated Real-Time system operating data is unavailable. (R1.4)	Data specification incomplete (missing either the list of required data (R1.1), or the timeframe for providing data. (R1.3)	No data specification (R1)
R1	<i>Proposed Change</i>	The Reliability Coordinator's data specification is missing the mutually agreeable format as specified in R1.2.	The Reliability Coordinator's data specification is missing a process for data provision when automated Real-Time system operating data is unavailable s specified in R1.4.	The Reliability Coordinator's data specification is missing either the list of required data as specified in R1.1, or the timeframe for providing data as specified in R1.3.	The Reliability Coordinator has no data specification.
Explanation – Modified for clarity and consistency with other standards and VSLs.					
R2. The Reliability Coordinator shall distribute its data specification to entities that have Facilities monitored by the Reliability Coordinator and to entities that provide Facility status to the Reliability Coordinator.	<i>Balloted Language</i>	Distributed its data specification to greater than or equal to 95% but less than 100% of the entities that have Facilities monitored by the Reliability Coordinator and the entities that provide the Reliability Coordinator with Facility status.	Distributed its data specification to greater than or equal to 85% but less than 95% of the entities that have Facilities monitored by the Reliability Coordinator and the entities that provide the Reliability Coordinator with Facility status. (R2)	Distributed its data specification to greater than or equal to 75% - but less then 85% of the entities that have Facilities monitored by the Reliability Coordinator and the entities that provide the Reliability Coordinator with Facility status. (R2)	Data specification distributed to less than 75% of the entities that have Facilities monitored by the Reliability Coordinator and the entities that provide the Reliability Coordinator with Facility status. (R2)

Staff Proposed Changes to Previously Balloted Violation Severity Levels (IRO)

IRO-010-1 - Reliability Coordinator Data Specification and Collection					
	<i>VSL</i>	<i>Lower</i>	<i>Moderate</i>	<i>High</i>	<i>Severe</i>
R2	<i>Proposed Change</i>	The Reliability Coordinator distributed its data specification to greater than or equal to 95% but less than 100% of the entities that have Facilities monitored by the Reliability Coordinator and the entities that provide the Reliability Coordinator with Facility status.	The Reliability Coordinator distributed its data specification to greater than or equal to 85% but less than 95% of the entities that have Facilities monitored by the Reliability Coordinator and the entities that provide the Reliability Coordinator with Facility status.	The Reliability Coordinator distributed its data specification to greater than or equal to 75% - but less than 85% of the entities that have Facilities monitored by the Reliability Coordinator and the entities that provide the Reliability Coordinator with Facility status.	The Reliability Coordinator data specification distributed to less than 75% of the entities that have Facilities monitored by the Reliability Coordinator and the entities that provide the Reliability Coordinator with Facility status.
Explanation – Modified for clarity and consistency with other standards and VSLs.					
R3. Each Balancing Authority, Generator Owner, Generator Operator, Interchange Authority, Load-serving Entity, Reliability Coordinator, Transmission Operator, and Transmission Owner shall provide data and information, as specified, to the Reliability Coordinator(s) with which it has a reliability relationship.	<i>Balloted Language</i>	Provided greater than or equal to 95% but less than 100% of the data and information as specified. (R3)	Provided greater than or equal to 85% but less than 95% of the data and information as specified. (R3)	Provided greater than or equal to 75% but less than 85% of the data and information as specified. (R3)	Provided less than 75% of the data and information as specified. (R3)
R3	<i>Proposed Change</i>	The responsible entity provided greater than or equal to 95% but less than 100% of the data and information as specified.	The responsible entity provided greater than or equal to 85% but less than 95% of the data and information as specified.	The responsible entity provided greater than or equal to 75% but less than 85% of the data and information as specified.	The responsible entity provided less than 75% of the data and information as specified.
Explanation – Modified for clarity and consistency with other standards and VSLs.					

IRO-014-1 - Procedures, Processes, or Plans to Support Coordination Between RCs					
	<i>VSL</i>	<i>Lower</i>	<i>Moderate</i>	<i>High</i>	<i>Severe</i>
R2. Each Reliability Coordinator's Operating Procedure, Process, or Plan that requires one or more other Reliability Coordinators to take action (e.g., make notifications, exchange information, or coordinate actions) shall be:	<i>Balloted Language</i>	N/A	N/A	N/A	The Reliability Coordinator's Operating Procedure, Process, or Plan failed to comply with either IRO-014-1 R2.1 or R2.2.
R2.1. Agreed to by all the Reliability Coordinators required to take the indicated action(s).	<i>Balloted Language</i>	N/A	N/A	N/A	The Reliability Coordinator's Operating Procedure, Process, or Plan was not agreed to by all the Reliability Coordinators required to take the indicated action(s).
R2.2. Distributed to all Reliability Coordinators that are required to take the indicated action(s).	<i>Balloted Language</i>	N/A	N/A	N/A	The Reliability Coordinator's Operating Procedure, Process, or Plan was not distributed to all Reliability Coordinators that are required to take the indicated action(s).
R2	<i>Proposed Change</i>	N/A	The Reliability Coordinator's Operating Procedure, Process, or Plan was not agreed to by all the Reliability Coordinators required to take the indicated action(s). (R2.1) OR The Reliability Coordinator's Operating Procedure, Process, or	N/A	The Reliability Coordinator's Operating Procedure, Process, or Plan failed to comply with both R2.1 and R2.2.

Staff Proposed Changes to Previously Balloted Violation Severity Levels (IRO)

IRO-014-1 - Procedures, Processes, or Plans to Support Coordination Between RCs					
	<i>VSL</i>	<i>Lower</i>	<i>Moderate</i>	<i>High</i>	<i>Severe</i>
			Plan was not distributed to all Reliability Coordinators that are required to take the indicated action(s). (R2.2)		
Explanation – The VSLS were modified for clarity and consistency with other standards and VSLs. Consistent with Guidelines filed with FERC on August 11, 2009, incorporated the sub-requirements into the Main Requirement VSL so that compliance is based on meeting criteria specified in components.					
R3. A Reliability Coordinator's Operating Procedures, Processes, or Plans developed to support a Reliability Coordinator-to-Reliability Coordinator Operating Procedure, Process, or Plan shall include:	<i>Balloted Language</i>	N/A	N/A	N/A	The Reliability Coordinator's Operating Procedure, Process, or Plan failed to comply with either IRO-014-1 R3.1 or R3.2.
R3.1. A reference to the associated Reliability Coordinator-to-Reliability Coordinator Operating Procedure, Process, or Plan.	<i>Balloted Language</i>	N/A	N/A	N/A	The Reliability Coordinator's Operating Procedure, Process, or Plan failed to reference the associated Reliability Coordinator-to-Reliability Coordinator Operating Procedure, Process, or Plan.
R3.2. The agreed-upon actions from the associated Reliability Coordinator-to-Reliability Coordinator Operating Procedure, Process, or Plan.	<i>Balloted Language</i>	N/A	N/A	N/A	The Reliability Coordinator's Operating Procedure, Process, or Plan failed to include the agreed-upon actions from the associated Reliability Coordinator-to-Reliability Coordinator Operating Procedure, Process, or Plan.

Staff Proposed Changes to Previously Balloted Violation Severity Levels (IRO)

IRO-014-1 - Procedures, Processes, or Plans to Support Coordination Between RCs					
	<i>VSL</i>	<i>Lower</i>	<i>Moderate</i>	<i>High</i>	<i>Severe</i>
R3	<i>Proposed Change</i>	N/A	The Reliability Coordinator's Operating Procedure, Process, or Plan failed to reference the associated Reliability Coordinator-to-Reliability Coordinator Operating Procedure, Process, or Plan. (R3.1) OR The Reliability Coordinator's Operating Procedure, Process, or Plan failed to include the agreed-upon actions from the associated Reliability Coordinator-to-Reliability Coordinator Operating Procedure, Process, or Plan. (R3.2)	N/A	The Reliability Coordinator's Operating Procedure, Process, or Plan complied with neither R3.1 nor R3.2.
<p>Explanation – The VSLs were modified for clarity and consistency with other standards and VSLs. Consistent with Guidelines filed with FERC on August 11, 2009, incorporated the sub-requirements into the Main Requirement VSL so that compliance is based on meeting criteria specified in components.</p>					

IRO-015-1 - Notifications and Information Exchange Between Reliability Coordinators					
	<i>VSL</i>	<i>Lower</i>	<i>Moderate</i>	<i>High</i>	<i>Severe</i>
R1. The Reliability Coordinator shall follow its Operating Procedures, Processes, or Plans for making notifications and exchanging reliability-related information with other Reliability Coordinators.	<i>Balloted Language</i>	N/A	The Reliability Coordinator failed to follow its Operating Procedures, Processes, or Plans for making notifications and exchanging reliability-related information with other Reliability Coordinators but no adverse reliability impacts resulted from the incident.	N/A	The Reliability Coordinator failed to follow its Operating Procedures, Processes, or Plans for making notifications and exchanging reliability-related information with other Reliability Coordinators and adverse reliability impacts resulted from the incident.
R1.1. The Reliability Coordinator shall make notifications to other Reliability Coordinators of conditions in its Reliability Coordinator Area that may impact other Reliability Coordinator Areas.		N/A	The Reliability Coordinator failed to make notifications to other Reliability Coordinators of conditions in its Reliability Coordinator Area that may impact other Reliability Coordinator Areas but no adverse reliability impacts resulted from the incident.	N/A	The Reliability Coordinator failed to make notifications to other Reliability Coordinators of conditions in its Reliability Coordinator Area that may impact other Reliability Coordinator Areas and adverse reliability impacts resulted from the incident.
R1	<i>Proposed Change</i>	The Reliability Coordinator failed to notify 5% or less of the other Reliability Coordinators of conditions in its Reliability Coordinator Area that may impact them as per R1.1. OR The Reliability	The Reliability Coordinator failed to notify more than 5% up to (and including) 10% of the other Reliability Coordinators of conditions in its Reliability Coordinator Area that may impact them as per R1.1.	The Reliability Coordinator failed to notify more than 10% up to (and including) 15% of the other Reliability Coordinators of conditions in its Reliability Coordinator Area that may impact them as per R1.1.	The Reliability Coordinator failed to notify more than 15% of the other Reliability Coordinators of conditions in its Reliability Coordinator Area that may impact them as per R1.1.

Staff Proposed Changes to Previously Balloted Violation Severity Levels (IRO)

IRO-015-1 - Notifications and Information Exchange Between Reliability Coordinators					
	<i>VSL</i>	<i>Lower</i>	<i>Moderate</i>	<i>High</i>	<i>Severe</i>
		Coordinator failed to follow its Operating Procedures, Processes, or Plans for making notifications and exchanging reliability-related information with other Reliability Coordinators.			
Explanation – The VSLs were modified for clarity and consistency with other standards and VSLs. Consistent with Guidelines filed with FERC on August 11, 2009, NERC incorporated the sub-requirements into the Main Requirement VSL so that compliance is based on meeting criteria specified in components.					
R2. The Reliability Coordinator shall participate in agreed upon conference calls and other communication forums with adjacent Reliability Coordinators.	<i>Balloted Language</i>	N/A	N/A	N/A	The Reliability Coordinator failed to participate in agreed upon conference calls and other communication forums with adjacent Reliability Coordinators.
R2.1. The frequency of these conference calls shall be agreed upon by all involved Reliability Coordinators and shall be at least weekly.		N/A	N/A	N/A	The Reliability Operator failed to participate in the assessment of the need and frequency of conference calls with other Reliability Operators.
R2	<i>Proposed Change</i>	The Reliability Coordinator failed to participate in 5% or less of agreed upon conference calls and other communication forums with adjacent Reliability Coordinators as per R2.1.	The Reliability Coordinator failed to participate in more than 5% up to (and including) 10% of agreed upon conference calls and other communication forums with adjacent Reliability Coordinators as per R2.1.	The Reliability Coordinator failed to participate in more than 10% up to (and including) 15% of agreed upon conference calls and other communication forums with adjacent Reliability Coordinators as per R2.1.	The Reliability Coordinator failed to participate in more than 15% of agreed upon conference calls and other communication forums with adjacent Reliability Coordinators as per R2.1.
Explanation – he VSLs were modified for clarity and consistency with other standards and VSLs. Consistent with Guidelines filed with FERC on August 11,					

Staff Proposed Changes to Previously Balloted Violation Severity Levels (IRO)

IRO-015-1 - Notifications and Information Exchange Between Reliability Coordinators					
	<i>VSL</i>	<i>Lower</i>	<i>Moderate</i>	<i>High</i>	<i>Severe</i>
2009, NERC incorporated the sub-requirements into the Main Requirement VSL so that compliance is based on meeting criteria specified in components.					

IRO-016-1 - Coordination of Real-time Activities Between Reliability Coordinators					
	<i>VSL</i>	<i>Lower</i>	<i>Moderate</i>	<i>High</i>	<i>Severe</i>
R1. The Reliability Coordinator that identifies a potential, expected, or actual problem that requires the actions of one or more other Reliability Coordinators shall contact the other Reliability Coordinator(s) to confirm that there is a problem and then discuss options and decide upon a solution to prevent or resolve the identified problem.	<i>Balloted Language</i>	The Reliability Coordinator that identified a potential, expected, or actual problem that required the actions of one or more other Reliability Coordinators, contacted the other Reliability Coordinator(s) to confirm that there was a problem, discussed options and decided upon a solution to prevent or resolve the identified problem, but failed to have evidence that it coordinated with other Reliability Coordinators.	N/A	N/A	The Reliability Coordinator that identified a potential, expected, or actual problem that required the actions of one or more other Reliability Coordinators failed to contact the other Reliability Coordinator(s) to confirm that there was a problem, discuss options and decide upon a solution to prevent or resolve the identified problem.
R1.1. If the involved Reliability Coordinators agree on the problem and the actions to take to prevent or mitigate the system condition, each involved Reliability Coordinator shall implement the agreed-upon solution, and notify the involved Reliability Coordinators of the action(s) taken.	<i>Balloted Language</i>	The responsible entity agreed on the problem and the actions to take to prevent or mitigate the system condition, implemented the agreed-upon solution, but failed to notify the involved Reliability Coordinators of the action(s) taken.	N/A	N/A	The responsible entity agreed on the problem and the actions to take to prevent or mitigate the system condition, but failed to implement the agreed-upon solution.
R1.2. If the involved Reliability Coordinators cannot agree on the problem(s) each Reliability Coordinator shall re-evaluate the causes of the disagreement (bad data, status, study results, tools, etc.).	<i>Balloted Language</i>	N/A	N/A	N/A	The involved Reliability Coordinators could not agree on the problem(s), but a Reliability Coordinator failed to re-evaluate the causes of the disagreement (bad data, status, study

Staff Proposed Changes to Previously Balloted Violation Severity Levels (IRO)

IRO-016-1 - Coordination of Real-time Activities Between Reliability Coordinators					
	<i>VSL</i>	<i>Lower</i>	<i>Moderate</i>	<i>High</i>	<i>Severe</i>
					results, tools, etc.).
R1.2.1. If time permits, this re-evaluation shall be done before taking corrective actions.	<i>Balloted Language</i>	N/A	N/A	N/A	The Reliability Coordinator failed to re-evaluate the problem prior to taking corrective actions, during periods when time was not an issue.
R1.2.2. If time does not permit, then each Reliability Coordinator shall operate as though the problem(s) exist(s) until the conflicting system status is resolved.	<i>Balloted Language</i>	N/A	N/A	N/A	The Reliability Coordinator failed to operate as though the problem(s) exist(s) until the conflicting system status was resolved, during periods when time was an issue.
R1.3. If the involved Reliability Coordinators cannot agree on the solution, the more conservative solution shall be implemented.	<i>Balloted Language</i>	N/A	N/A	N/A	The Reliability Coordinator implemented a solution other than the most conservative solution, when agreement on the solution could not be reached.
R1	<i>Proposed Change</i>	The Reliability Coordinator failed to contact other Reliability Coordinators to confirm that there was a problem when it identified a potential or expected problem that required the actions of those other Reliability Coordinators as per R1.1 through R1.3.	The Reliability Coordinator failed to discuss options and decide upon a solution to prevent or resolve the identified expected or potential problem when it contacted other Reliability Coordinators to confirm that there was a problem when it identified a potential or	The Reliability Coordinator failed to contact other Reliability Coordinators to confirm that there was a problem when it identified an actual problem that required the actions of those other Reliability Coordinators as per R1.1 through R1.3.	The Reliability Coordinator failed to discuss options and decide upon a solution to prevent or resolve the identified actual problem when it contacted other Reliability Coordinators to confirm that there was a problem when it identified a potential or

Staff Proposed Changes to Previously Balloted Violation Severity Levels (IRO)

IRO-016-1 - Coordination of Real-time Activities Between Reliability Coordinators					
	<i>VSL</i>	<i>Lower</i>	<i>Moderate</i>	<i>High</i>	<i>Severe</i>
			expected problem that required the actions of those other Reliability Coordinators as per R1.1 through R1.3.		expected problem that required the actions of those other Reliability Coordinators as per R1.1 through R1.3.
Explanation – Consistent with Guidelines filed with FERC on August 11, 2009, NERC incorporated the sub-requirements into the Main Requirement VSL so that compliance is based on meeting criteria specified in components.					