

Standard Development Timeline

This section is maintained by the drafting team during the development of the standard and will be removed when the standard becomes effective.

Development Steps Completed

SAR posted for comment February 21, 2014 – March 24, 2014

Description of Current Draft

This is the first posting of the revised standard under Project 2014-03 Revisions to the TOP/IRO Reliability Standards. The SDT is working under a deadline for filing the revised standards with FERC of January 31, 2015.

| Anticipated Actions | Anticipated Date |
|---------------------|------------------|
| Additional ballot | August 2014 |
| Final ballot | October 2014 |
| BOT | November 2014 |

Version History

| Version | Date | Action | Change Tracking |
|---------|-------------------|---|-----------------|
| 0 | April 1, 2005 | Effective Date | New |
| 0 | August 8, 2005 | Removed "Proposed" from Effective Date | Errata |
| 1 | November 1, 2006 | Adopted by Board of Trustees | Revised |
| 1 | November 19, 2006 | Changes "Distribution Provider" to "Transmission Service provider" | Errata |
| 1.1 | October 29, 2008 | Removed "proposed" from effective date BOT adopted errata changes: updated version number to "1.1" | Errata |
| 1.1 | May 13, 2009 | FERC Approval | Revised |
| -3 | August 4, 2011 | Approved by Board of Trustees | |
| -4 | April 2014 | Revisions as per Project 2014-03 | |

Definitions of Terms Used in Standard

This section includes all newly defined or revised terms used in the proposed standard. Terms already defined in the Reliability Standards Glossary of Terms are not repeated here. New or revised definitions listed below become approved when the proposed standard is approved. When the standard becomes effective, these defined terms will be removed from the individual standard and added to the Glossary.

There are no new or revised definitions proposed in this standard revision.

When this standard has received ballot approval, the text boxes will be moved to the Application Guidelines Section of the Standard.

A. Introduction

1. **Title:** Reliability Coordination – Responsibilities
2. **Number:** IRO-001-4
3. **Purpose:** To establish the responsibility of Reliability Coordinators to act or direct other entities to act.
4. **Applicability**

Rationale: Purchasing-Selling Entity and Load-Serving Entity have been deleted from the approved IRO-001-1.1 as they are not listed as entities that the Reliability Coordinator directs in Functional Model v5. They do not show in this red-line as this red-line is based on IRO-001-3 as originally submitted by Project 2006-06 where they were initially removed.

- 4.1. Reliability Coordinator
- 4.2. Transmission Operator
- 4.3. Balancing Authority
- 4.4. Generator Operator
- 4.5. Distribution Provider
- 4.6. Transmission Service Provider
5. **Effective Date:**

The standard shall become effective on the first day of the first calendar quarter that is twelve (12) months after the date that the standard is approved by an applicable governmental authority or as otherwise provided for in a jurisdiction where approval by an applicable governmental authority is required for a standard to go into effect. Where approval by an applicable governmental authority is not required, the standard shall become effective on the first day of the first calendar quarter that is twelve (12) months after the date the standard is adopted by the NERC Board of Trustees or as otherwise provided for in that jurisdiction.
6. **Background:**

On April 16, 2013, NERC submitted two petitions requesting Commission approval of TOP and IRO standards. [One petition](#) addresses three revised TOP Reliability Standards: TOP-001-2 (Transmission Operations), TOP-002-3 (Operations Planning), TOP-003-2 (Operational Reliability Data), and one Protection Systems (PRC) Reliability Standard, PRC-001-2 (System Protection Coordination) to replace the eight currently-effective TOP standards. The [second petition](#) addresses four revised IRO Reliability Standards: IRO-001-3 (Responsibilities and Authorities), IRO-002-3 (Analysis Tools),

IRO-005-4 (Current Day Operations), and IRO-014-2 (Coordination Among Reliability Coordinators) to replace six currently-effective IRO standards.

On November 21, 2013, the Commission issued a [NOPR](#) proposing to remand these TOP and IRO Standards, stating that NERC “has removed critical reliability aspects that are included in the currently-effective standards without adequately addressing these aspects in the proposed standards.” For example, the Commission cites the fact that the proposed TOP Standards do not require Transmission Operators to plan and operate within all System Operating Limits (“SOLs”), which is a requirement in the currently-effective standards.

On December 20, 2013, NERC filed a [motion](#) requesting that the Commission defer action on the NOPR until January 31, 2015 to provide NERC and the industry the opportunity to thoroughly examine the technical concerns raised in the NOPR and afford time to review the proposed TOP and IRO Standards through the NERC standards development process to ensure that a technically justified set of solutions is in place for reliability. That motion to defer action was granted on January 14, 2014.

On February 12, 2014, the Standards Committee appointed a Standard Drafting Team to take on the task of revising the aforementioned standards in response to the NOPR issues and the recommendations made by the Independent Expert Review Panel, the IRO FYRT, and the SW Outage Report.

B. Requirements and Measures

Rationale: The change from Reliability Directive to Operating Instruction throughout the standard is in response to NOPR paragraph 64 (...“*We believe that directives from a reliability coordinator or transmission operator should be mandatory at all times, and not just during emergencies (unless contrary to safety, equipment, regulatory or statutory requirements). For example, mandatory compliance with directives in non-emergency situations is important when a decision is made to alter or maintain the state of an element on the interconnected transmission network...*”) This change is also consistent with the proposed COM-002-4.

- R1.** Each Reliability Coordinator shall act, or direct others to act, by issuing Operating Instructions, to ensure the reliability of its Reliability Coordinator Area. [*Violation Risk Factor: High*][*Time Horizon: Operations Planning, Same-Day Operations, Real-time Operations*]
- M1.** Each Reliability Coordinator shall have and provide evidence which may include, but is not limited to dated operator logs, dated records, dated and time-stamped voice recordings or dated transcripts of voice recordings, electronic communications, or equivalent documentation, that will be used to determine that it acted, or directed

others to act, by issuing Operating Instructions to ensure the reliability of its Reliability Coordinator Area.

Rationale for Requirements R2 and R3: The addition of Transmission Service Provider to Requirements R2 and R3 allows for the retirement of IRO-004-2.

- R2.** Each Transmission Operator, Balancing Authority, Generator Operator, Transmission Service Provider, and Distribution Provider shall comply with its Reliability Coordinator's Operating Instructions unless compliance with the Operating Instructions cannot be physically implemented or unless such actions would violate safety, equipment, regulatory, or statutory requirements. *[Violation Risk Factor: High] [Time Horizon: Operations Planning, Same-Day Operations, Real-time Operations]*
- M2.** Each Transmission Operator, Balancing Authority, Generator Operator, Transmission Service Provider, and Distribution Provider shall have and provide evidence which may include, but is not limited to dated operator logs, dated records, dated and time-stamped voice recordings or dated transcripts of voice recordings, electronic communications, or equivalent documentation, that will be used to determine that it complied with its Reliability Coordinator's Operating Instructions, unless the instruction could not be physically implemented, or such actions would have violated safety, equipment, regulatory or statutory requirements. In such cases, the Transmission Operator, Balancing Authority, Generator Operator, Transmission Service Provider, or Distribution Provider shall have and provide copies of the safety, equipment, regulatory, or statutory requirements as evidence for not complying with the Reliability Coordinator's Operating Instructions. If such a situation has not occurred, the Transmission Operator, Balancing Authority, Generator Operator, Transmission Service Provider, or Distribution Provider may provide an attestation.
- R3.** Each Transmission Operator, Balancing Authority, Generator Operator, Transmission Service Provider, and Distribution Provider shall inform its Reliability Coordinator of its inability to perform the Operating Instruction issued by its Reliability Coordinator in Requirement R2 citing one of the specific reasons shown in Requirement R2. *[Violation Risk Factor: High] [Time Horizon: Operations Planning, Same-Day Operations, Real-time Operations]*
- M3.** Each Transmission Operator, Balancing Authority, Generator Operator, Transmission Service Provider, and Distribution Provider shall have and provide evidence which may include, but is not limited to dated operator logs, dated records, dated and time-stamped voice recordings or dated transcripts of voice recordings, electronic communications, or equivalent documentation, that will be used to determine that it informed its Reliability Coordinator of its inability to perform an Operating Instruction issued by its Reliability Coordinator in Requirement R2 citing one of the reasons shown in Requirement R2.

C. Compliance

1. Compliance Monitoring Process

1.1. Compliance Enforcement Authority

As defined in the NERC Rules of Procedure, “Compliance Enforcement Authority” (CEA) means NERC or the Regional Entity in their respective roles of monitoring and enforcing compliance with the NERC Reliability Standards.

1.2. Compliance Monitoring and Enforcement Processes:

Compliance Audit

Self-Certification

Spot Checking

Compliance Investigation

Self-Reporting

Complaint

1.3. Data Retention

The following evidence retention periods identify the period of time an entity is required to retain specific evidence to demonstrate compliance. For instances where the evidence retention period specified below is shorter than the time since the last audit, the Compliance Enforcement Authority may ask an entity to provide other evidence to show that it was compliant for the full time period since the last audit.

The Reliability Coordinator, Transmission Operator, Balancing Authority, Generator Operator, Transmission Service Provider, and Distribution Provider shall keep data or evidence to show compliance as identified below unless directed by its Compliance Enforcement Authority to retain specific evidence for a longer period of time as part of an investigation:

- The Reliability Coordinator for Requirement R1, Measure M1 shall retain voice recordings for the most recent 90-calendar days and documentation for the most recent 12-calendar months.
- The Transmission Operator, Balancing Authority, Generator Operator, Transmission Service Provider, and Distribution Provider for Requirements R2 and R3, Measures M2 and M3 shall retain voice recordings for the most recent 90-calendar days and documentation for the most recent 12-calendar months.

If a Reliability Coordinator, Transmission Operator, Balancing Authority, Generator Operator, Transmission Service Provider, or Distribution Provider is found non-compliant, it shall keep information related to the non-compliance

until mitigation is complete and approved or for the time specified above, whichever is longer.

The Compliance Enforcement Authority shall keep the last audit records and all requested and submitted subsequent audit records.

1.4. Additional Compliance Information

None.

Table of Compliance Elements

| R # | Time Horizon | VRF | Violation Severity Levels | | | |
|-----|--|------|---------------------------|--------------|----------|---|
| | | | Lower VSL | Moderate VSL | High VSL | Severe VSL |
| R1 | Operations Planning, Same-Day Operations, Real-time Operations | High | N/A | N/A | N/A | The Reliability Coordinator failed to act, or direct others to act, by issuing Operating Instructions, to ensure the reliability of its Reliability Coordinator Area. |
| R2 | Operations Planning, Same-Day Operations, Real-time Operations | High | N/A | N/A | N/A | The responsible entity did not comply with the Reliability Coordinator’s Operating Instructions, and compliance with the Operating Instructions could have been physically implemented and such actions would not have violated safety, equipment, regulatory, or statutory requirements. |
| R3 | Operations Planning, Same-Day Operations, Real-time Operations | High | N/A | N/A | N/A | The responsible entity failed to inform its Reliability Coordinator upon recognition of its inability to perform an Operating Instruction Issued by its Reliability Coordinator in Requirement R2 citing one of the reasons shown in Requirement R2. |

D. Regional Variances

None.

E. Interpretations

None.

F. Associated Documents

None.