

Conference Call Agenda Project 2015-06 IRO Standards Drafting Team

Friday, April 17, 2015, 11:00 a.m. to 1:00 p.m. Eastern

Dial-in: 866.740.1260 | Access Code: 5506033 | Security Code: 33015

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Administrative

1. **Review NERC Antitrust Compliance Guidelines and Public Announcement***
2. **Participant Conduct Policy***
3. **Email List Policy***
4. **Review Meeting Agenda and Objectives***

Agenda Items

1. **Introductions**
2. **Project Timeline**
3. **SAR Comments***
 - a. Review comments submitted during 03/16/15 - 04/15/15 comment period
 - b. Consider draft responses to comments
4. **Proposed Redlines to Standards***
 - a. IRO-006-EAST
 - b. IRO-009
5. **Future Meeting and Action Dates**
6. **Outreach**
7. **Adjourn**

*Background materials included

Antitrust Compliance Guidelines

I. General

It is NERC's policy and practice to obey the antitrust laws and to avoid all conduct that unreasonably restrains competition. This policy requires the avoidance of any conduct that violates, or that might appear to violate, the antitrust laws. Among other things, the antitrust laws forbid any agreement between or among competitors regarding prices, availability of service, product design, terms of sale, division of markets, allocation of customers or any other activity that unreasonably restrains competition.

It is the responsibility of every NERC participant and employee who may in any way affect NERC's compliance with the antitrust laws to carry out this commitment.

Antitrust laws are complex and subject to court interpretation that can vary over time and from one court to another. The purpose of these guidelines is to alert NERC participants and employees to potential antitrust problems and to set forth policies to be followed with respect to activities that may involve antitrust considerations. In some instances, the NERC policy contained in these guidelines is stricter than the applicable antitrust laws. Any NERC participant or employee who is uncertain about the legal ramifications of a particular course of conduct or who has doubts or concerns about whether NERC's antitrust compliance policy is implicated in any situation should consult NERC's General Counsel immediately.

II. Prohibited Activities

Participants in NERC activities (including those of its committees and subgroups) should refrain from the following when acting in their capacity as participants in NERC activities (e.g., at NERC meetings, conference calls and in informal discussions):

- Discussions involving pricing information, especially margin (profit) and internal cost information and participants' expectations as to their future prices or internal costs.
- Discussions of a participant's marketing strategies.
- Discussions regarding how customers and geographical areas are to be divided among competitors.
- Discussions concerning the exclusion of competitors from markets.
- Discussions concerning boycotting or group refusals to deal with competitors, vendors or suppliers.

- Any other matters that do not clearly fall within these guidelines should be reviewed with NERC's General Counsel before being discussed.

III. Activities That Are Permitted

From time to time decisions or actions of NERC (including those of its committees and subgroups) may have a negative impact on particular entities and thus in that sense adversely impact competition. Decisions and actions by NERC (including its committees and subgroups) should only be undertaken for the purpose of promoting and maintaining the reliability and adequacy of the bulk power system. If you do not have a legitimate purpose consistent with this objective for discussing a matter, please refrain from discussing the matter during NERC meetings and in other NERC-related communications.

You should also ensure that NERC procedures, including those set forth in NERC's Certificate of Incorporation, Bylaws, and Rules of Procedure are followed in conducting NERC business.

In addition, all discussions in NERC meetings and other NERC-related communications should be within the scope of the mandate for or assignment to the particular NERC committee or subgroup, as well as within the scope of the published agenda for the meeting.

No decisions should be made nor any actions taken in NERC activities for the purpose of giving an industry participant or group of participants a competitive advantage over other participants. In particular, decisions with respect to setting, revising, or assessing compliance with NERC reliability standards should not be influenced by anti-competitive motivations.

Subject to the foregoing restrictions, participants in NERC activities may discuss:

- Reliability matters relating to the bulk power system, including operation and planning matters such as establishing or revising reliability standards, special operating procedures, operating transfer capabilities, and plans for new facilities.
- Matters relating to the impact of reliability standards for the bulk power system on electricity markets, and the impact of electricity market operations on the reliability of the bulk power system.
- Proposed filings or other communications with state or federal regulatory authorities or other governmental entities.

Matters relating to the internal governance, management and operation of NERC, such as nominations for vacant committee positions, budgeting and assessments, and employment matters; and procedural matters such as planning and scheduling meetings.

Public Announcements

REMINDER FOR USE AT BEGINNING OF MEETINGS AND CONFERENCE CALLS THAT HAVE BEEN PUBLICLY NOTICED AND ARE OPEN TO THE PUBLIC

Conference call version:

Participants are reminded that this conference call is public. The access number was posted on the NERC website and widely distributed. Speakers on the call should keep in mind that the listening audience may include members of the press and representatives of various governmental authorities, in addition to the expected participation by industry stakeholders.

Standards Development Process Participant Conduct Policy

I. General

To ensure that the standards development process is conducted in a responsible, timely and efficient manner, it is essential to maintain a professional and constructive work environment for all participants. Participants include, but are not limited to, members of the standard drafting team and observers.

Consistent with the NERC Rules of Procedure and the NERC Standard Processes Manual, participation in NERC's Reliability Standards development balloting and approval processes is open to all entities materially affected by NERC's Reliability Standards. In order to ensure the standards development process remains open and to facilitate the development of reliability standards in a timely manner, NERC has adopted the following Participant Conduct Policy for all participants in the standards development process.

II. Participant Conduct Policy

All participants in the standards development process must conduct themselves in a professional manner at all times. This policy includes in-person conduct and any communication, electronic or otherwise, made as a participant in the standards development process. Examples of unprofessional conduct include, but are not limited to, verbal altercations, use of abusive language, personal attacks or derogatory statements made against or directed at another participant, and frequent or patterned interruptions that disrupt the efficient conduct of a meeting or teleconference.

III. Reasonable Restrictions in Participation

If a participant does not comply with the Participant Conduct Policy, certain reasonable restrictions on participation in the standards development process may be imposed as described below.

If a NERC Standards Developer determines, by his or her own observation or by complaint of another participant, that a participant's behavior is disruptive to the orderly conduct of a meeting in progress, the NERC Standards Developer may remove the participant from a meeting. Removal by the NERC Standards Developer is limited solely to the meeting in progress and does not extend to any future meeting. Before a participant may be asked to leave the meeting, the NERC Standards Developer must first remind the participant of the obligation to conduct himself or herself in a professional manner and provide an opportunity for the participant to comply. If a participant is requested to leave a meeting by a NERC Standards Developer, the participant must cooperate fully with the request.

Similarly, if a NERC Standards Developer determines, by his or her own observation or by complaint of another participant, that a participant's behavior is disruptive to the orderly conduct of a

teleconference in progress, the NERC Standards Developer may request the participant to leave the teleconference. Removal by the NERC Standards Developer is limited solely to the teleconference in progress and does not extend to any future teleconference. Before a participant may be asked to leave the teleconference, the NERC Standards Developer must first remind the participant of the obligation to conduct himself or herself in a professional manner and provide an opportunity for the participant to comply. If a participant is requested to leave a teleconference by a NERC Standards Developer, the participant must cooperate fully with the request. Alternatively, the NERC Standards Developer may choose to terminate the teleconference.

At any time, the NERC Director of Standards, or a designee, may impose a restriction on a participant from one or more future meetings or teleconferences, a restriction on the use of any NERC-administered list server or other communication list, or such other restriction as may be reasonably necessary to maintain the orderly conduct of the standards development process. Restrictions imposed by the Director of Standards, or a designee, must be approved by the NERC General Counsel, or a designee, prior to implementation to ensure that the restriction is not unreasonable. Once approved, the restriction is binding on the participant. A restricted participant may request removal of the restriction by submitting a request in writing to the Director of Standards. The restriction will be removed at the reasonable discretion of the Director of Standards or a designee.

Any participant who has concerns about NERC's Participant Conduct Policy may contact NERC's General Counsel.

NERC Email List Policy

NERC provides email lists, or “listservs,” to NERC committees, groups, and teams to facilitate sharing information about NERC activities; including balloting, committee, working group, and drafting team work, with interested parties. All emails sent to NERC listserv addresses must be limited to topics that are directly relevant to the listserv group’s assigned scope of work. NERC reserves the right to apply administrative restrictions to any listserv or its participants, without advance notice, to ensure that the resource is used in accordance with this and other NERC policies.

Prohibited activities include using NERC-provided listservs for any price-fixing, division of markets, and/or other anti-competitive behavior.¹ Recipients and participants on NERC listservs may not utilize NERC listservs for their own private purposes. This may include announcements of a personal nature, sharing of files or attachments not directly relevant to the listserv group’s scope of responsibilities, and/or communication of personal views or opinions, unless those views are provided to advance the work of the listserv’s group. Use of NERC’s listservs is further subject to NERC’s Participant Conduct Policy for the Standards Development Process.

- *Updated April 2013*

¹ Please see NERC’s Antitrust Compliance Guidelines for more information about prohibited antitrust and anti-competitive behavior or practices. This policy is available at <http://www.nerc.com/commondocs.php?cd=2>

Comment Report 2015-06 IRO | IRO-006-East & IRO-009 SAR

Start Date 3/16/2015

End Date 4/16/2015

I. Do you agree with the recommendation regarding IRO-006-East? If not, please explain specifically what aspects of the recommendation you disagree with.

A. We reiterate the following comments which were submitted in 2013 when the 5-Year Review Team’s recommendations were posted for comment:

We do not agree with retiring R1 since it was added to the standard and worded that way to address a FERC directive which asked NERC to clearly include a requirement in the standard that TLR is not an effective means for mitigating IROL violation. The language “...prior to or concurrently with the initiation of the Eastern Interconnection TLR procedure (or continuing management of this procedure if already initiated)” is meant to convey the idea that TLR alone cannot and shall not be used to mitigate IROL exceedances, but can be used together with but not prior to other (presumably more effective) means.

The proposal to retire R3 also needs to be reconsidered. The need for this requirement in view of IDC’s automatic generation of the actions contained in R3 was debated at length when the standard was posted for commenting and balloting in 2009. In the end, the vast majority of the industry supported the notion that such actions would be required in the event that the IDC became unavailable. Also, there was the issue with respect to who would be held responsible for communicating these actions given that it was not appropriate for the vendor of IDC to take up this responsibility and ensure the correctness of the communicated actions. We suggest the 5-Year Review Team of the SDT to consult with NERC staff (the IRO-006-5 Standard Developer) and/or the TLR SDT for further details.

B. The un-official comment form posted on the project page states that IRO-006-EAST R1 is to be revised under Criterion B7 of Paragraph 81 but the PRT Template form states that R1 is to be retired. We believe this to simply be an error in drafting the Comment form language and that the review template is the correct reference.

We thank the PRT for identifying the redundancy with other standards and requirements and their application of Paragraph 81 Criteria. We agree with the recommended changes developed by the PRT.

- C. We do not agree with retiring R1 because it was added to the standard and worded to address a FERC directive. The directive asked NERC to clearly include a requirement in the standard that TLR is not an effective means for mitigating an IROL violation. The language "...prior to or concurrently with the initiation of the Eastern Interconnection TLR procedure (or continuing management of this procedure if already initiated)" is meant to convey the idea that TLR alone cannot and shall not be used to mitigate IROL exceedances, but can be used together with but not prior to other means. Disagree with the retirement of requirement R3 based on Paragraph 81 Criteria B1. Because the Purpose of IRO-006-East is "To provide an interconnection-wide transmission loading relief procedure (TLR) for the Eastern Interconnection that can be used to prevent and/or mitigate potential or actual System Operating Limit (SOL) and Interconnection Reliability Operating Limit (IROL) exceedances to maintain reliability of the Bulk Electric System (BES)." it is important that the RCs communicate this information to other RCs in the Eastern Interconnection. This is administrative in nature, but it does support reliability by providing an abnormal event response procedure to all entities that might be impacted. In past discussions, the vast majority of the industry supported the notion that such actions would be required in the event that the IDC became unavailable. Also, there was the issue with respect to who would be held responsible for communicating these actions given that it was not appropriate for the vendor of IDC to take responsibility and ensure the correctness of the communicated actions. We suggest the 5-Year Review Team of the SDT to consult with NERC staff (the IRO-006-5 Standard Developer) and/or the TLR SDT discuss and take this into consideration.
- D. While we agree with the recommendations and proposed modifications to IRO-006-EAST-1 and that IRO-006-EAST-1 R1 is redundant with IRO-009-1 R4, we have two concerns. First, we do not agree that IRO-006-EAST-1 R1 is redundant with IRO-008-1 R3 as documented in the five-year review template. Since it is redundant with another requirement this is just documentation issue that the drafting will need to address. Second, we encourage the drafting to review the proposed retirement of IRO-006-EAST-1 with FERC. As we recall, this requirement was added per a FERC directive when IRO-006 was approved. We agree that R3 is administrative documentation that meets P81 criteria. However, we encourage the drafting team to retain this documentation in the technical or application guidelines. It is helpful for those that do not use the IDC every day to understand how it works.

E. NOTE: IESO supports and joins these SRC comments generally, but does not support the retirement of Requirements R1 – R3. MISO and CAISO do not join these SRC comments.

II. Do you agree with the recommendation regarding IRO-009-1? If not, please explain specifically what aspects of the recommendation you disagree with.

- A. As indicated in our comments submitted during the posting of the 5-Year Review Team's recommendations in 2013, the proposal to remove "without delay" from R4 needs to be carefully considered. There was a lengthy debate on this during the posting and balloting of the previous version of this standard. The decision to leave this in the requirement was based primarily on concerns expressed by the regulatory authorities that, without such wording, Responsible Entities could delay taking actions until closer to the end of the Tv period. This would not drive the right behavior to mitigate IROL exceedances as soon as practicable. Please consult FERC staff and the NERC facilitator (Standard Developer) for the project and/or the Reliability Coordination SDT.
- B. Tacoma Power suggests that the Measures section be consistent. Measures M1 and M3 include language that refers to corresponding requirements. For example, Measure M1 includes "...in accordance with Requirement R1"; Measure M3 includes "...in accordance with Requirement R3". Measures M2 and M4, however, do not include references to their applicable requirements.
- C. Duke Energy suggests the following modification to R4:
"When mitigating the magnitude and duration of an IROL, and unanimity cannot be reached, each Reliability Coordinator that monitors that Facility (or group of Facilities) shall use the most limiting of the values under consideration."
We believe this allows Requirement 4 to be a stand-alone requirement and would not have to refer to other requirements for interpretation.
- D. We agree the revisions in IRO-009-1 improve the clarity of the Standard overall and provide a valid correction to the VSL on R3 regarding the five-minute timeframe.
- E. The posted IRO-009 redline is not an accurate reflection of the changes being considered in the standard. It does not show requirement R2 being revised to be Part 1.2, and it does not show requirement R5 being deleted. Standard format does not have Parts of requirements identified with "R"s.
It is not necessary to add Parts 1.1 and 1.2 (shown as R1.1 and R1.2). Requirement R1 wording can be revised to "...that can be implemented in time to prevent to prevent exceeding each of the identified IROL Tv."
In requirement R4, suggest revising the wording to "...immediately use the most limiting of the values under consideration to minimize the impact on reliability."

As indicated in comments submitted during the posting of the 5-Year Review Team's recommendations in 2013, the proposal to remove "without delay" from R4 needs to be carefully considered. There was a lengthy debate on this during the posting and balloting of the previous version of this standard. The decision to leave this in the requirement was based primarily on concerns expressed by the regulatory authorities that, without such wording, Responsible Entities could delay taking actions until closer to the end of the Tv period. This would not drive the right behavior to mitigate IROL

- F. R1 should be modified to use the approved format for NERC standards. Standards should use numbered lists or bullets in place of sub-requirements.
- G. The SRC suggests that the recommendations are appropriate, but has concerns regarding the potential redlines provided. More specifically, the SRC suggests that:
- Different interpretations regarding "expected" versus "actual" system conditions have been observed throughout the time period for which IRO-009 has been effective. Consistent definitions between the "expected" versus "actual" system conditions would be valuable to the reliability of the BES and would help to ensure that the data gathered for metrics related to IROL exceedances remains effective, accurate, and indicative of the impact of IROL exceedances on the BES. The SDT should evaluate how these terms can be clarified.
 - Terms such as "use" introduce ambiguity and should be evaluated for a determination of whether a more defined, specific action is expected and/or can be articulated.
 - The SDT should evaluate and revise the replaced requirement numbers as necessary to ensure accurate mapping between new and retired requirements. In particular, the SRC has identified two potential issues:
 - R1.2 is a replacement for the old Requirement R2 (not a replacement for the incorrectly referenced R 1.1 which did not exist).
 - The comment form states that Requirements R1, R4, and R5 are to be revised, but, in the redline, there is no Requirement R5.
 - The SRC suggests that the phrase "each of the identified IROLs such that each IROL...", which was added to Requirement R2 is redundant and should be revised to state "the identified IROL such that it..." More specifically, because Requirement R1 starts with the phrase "For each IROL...", which phrase already limits the sub requirements to a single identified IROL.
 - The SRC cannot support the proposal to remove "without delay" from R4. There was a lengthy debate on the use of this term previously and the decision to leave this in the requirement was based on concerns (particularly of the regulatory authorities) that, without such wording, Responsible Entities could delay taking

actions until closer to the end of the Tv period. This would not drive the right behavior to mitigate IROL exceedances as soon as practicable.

NOTE: MISO and CAISO do not join these SRC comments.

III. If you have any other comments on the Five-Year Review Recommendation that you have not already mentioned above, please provide them here:

- A. Texas RE noticed IRO-009-2 references an IROL Violation Report in EOP-004-1, which is retired. The form changed to an Event Reporting Form in EOP-004-2. Texas RE recommends the SDT change IRO-009-2 to reference the Event Reporting Form in EOP-004-2.
- B. Recommendations for consideration are: Modify the requirements to improve its clarity and measurability while removing ambiguity.

NOTE: MISO and CAISO do not join these SRC comments.

A. Introduction

1. **Title:** Transmission Loading Relief Procedure for the Eastern Interconnection
2. **Number:** IRO-006-EAST-~~24~~
3. **Purpose:** To provide an Interconnection-wide transmission loading relief procedure (TLR) for the Eastern Interconnection that can be used to prevent and/or mitigate potential or actual System Operating Limit (SOL) and Interconnection Reliability Operating Limit (IROL) exceedances to maintain reliability of the Bulk Electric System (BES).
4. **Applicability:**
 - 4.1. Reliability Coordinators in the Eastern Interconnection.
5. **Proposed Effective Date:** TBD

B. Requirements

~~**R1.** When acting or instructing others to act to mitigate the magnitude and duration of the instance of exceeding an IROL within that IROL's T_v , each Reliability Coordinator shall initiate, prior to or concurrently with the initiation of the Eastern Interconnection TLR procedure (or continuing management of this procedure if already initiated), one or more of the following actions: [*Violation Risk Factor: High*] [*Time Horizon: Real-time Operations*]~~

- ~~• Inter-area redispatch of generation~~
- ~~• Intra-area redispatch of generation~~
- ~~• Reconfiguration of the transmission system~~
- ~~• Voluntary load reductions (e.g., Demand side Management)~~
- ~~Controlled load reductions (e.g., load shedding)~~

R2-R1. To ensure operating entities are provided with information needed to maintain an awareness of changes to the Transmission System, when initiating the Eastern Interconnection TLR procedure to prevent or mitigate an SOL or IROL exceedance, and at least every clock hour (with the exception of TLR-1, where an hourly update is not required) after initiation up to and including the hour when the TLR level has been identified as TLR Level 0, the Reliability Coordinator shall identify: [*Violation Risk Factor: Medium*] [*Time Horizon: Real-time Operations*]

~~2.1.1.1.~~ A list of congestion management actions to be implemented, and

~~2.2.1.2.~~ One of the following TLR levels: TLR-1, TLR-2, TLR-3A, TLR-3B, TLR-4, TLR-5A, TLR-5B, TLR-6, TLR-0 ¹

~~**R3.** Upon the identification of the TLR level and a list of congestion management actions to be implemented, the Reliability Coordinator initiating this TLR~~

¹ For more information on TLR levels, please see "Implementation Guideline for Reliability Coordinators: Eastern Interconnection TLR Levels Reference Document."

~~procedure shall: [Violation Risk Factor: Medium] [Time Horizon: Real-time Operations]~~

~~3.1. — Notify all Reliability Coordinators in the Eastern Interconnection of the identified TLR level~~

~~3.2. — Communicate the list of congestion management actions to be implemented to 1.) all Reliability Coordinators in the Eastern Interconnection, and 2.) those Reliability Coordinators in other Interconnections responsible for curtailing Interchange Transactions crossing Interconnection boundaries identified in the list of congestion management actions.~~

~~3.3. — Request that the congestion management actions identified in Requirement R2, Part 2.1 be implemented by:~~

~~1.) Each Reliability Coordinator associated with a Sink Balancing Authority for which Interchange Transactions are to be curtailed,~~

~~2.) Each Reliability Coordinator associated with a Balancing Authority in the Eastern Interconnection for which Network Integration Transmission Service or Native Load is to be curtailed, and~~

~~3.) Each Reliability Coordinator associated with a Balancing Authority in the Eastern Interconnection for which its Market Flow is to be curtailed.~~

R4.R2. Each Reliability Coordinator that receives a request for congestion management actions ~~as described in Requirement R3, Part 3.3.~~ shall, within 15 minutes of receiving the request, implement the congestion management actions requested by the issuing Reliability Coordinator as follows: *[Violation Risk Factor: High] [Time Horizon: Real-time Operations]*

- Instruct its Balancing Authorities to implement the Interchange Transaction schedule change requests.
- Instruct its Balancing Authorities to implement the Network Integration Transmission Service and Native Load schedule changes for which the Balancing Authorities are responsible.
- Instruct its Balancing Authorities to implement the Market Flow schedule changes for which the Balancing Authorities are responsible.
- If an assessment determines ~~shows~~ that one or more of the congestion management actions communicated ~~in Requirement R3, Part 3.3~~ will result in a reliability concern or will be ineffective, the Reliability Coordinator may replace those specific actions with alternate congestion management actions, provided that:
 - The alternate congestion management actions have been agreed to by the initiating Reliability Coordinator, and
 - The assessment shows that the alternate congestion management actions will not adversely affect reliability.

C. Measures

~~M1.~~ Each Reliability Coordinator shall provide evidence (such as dated logs, voice recordings, or other information in electronic or hard-copy format) that when acting or instructing others to act to mitigate the magnitude and duration of the instance of exceeding an IROL within that IROL's T_v, the Reliability Coordinator initiated one or more of the actions listed in R1 prior to or concurrently with the initiation of the Eastern Interconnection TLR procedure (or continuing management of this procedure if already initiated)(R1).

M12. Each Reliability Coordinator shall provide evidence (such as dated logs, voice recordings, or other information in electronic or hard-copy format) that at the time it initiated the Eastern Interconnection TLR procedure, and at least every clock hour after initiation up to and including the hour when the TLR level was identified as TLR Level 0, the Reliability Coordinator identified both the TLR Level and a list of congestion management actions to be implemented (R21).

~~M3.~~ Each Reliability Coordinator shall provide evidence (such as dated logs, voice recordings, or other information in electronic or hard-copy format) that after it identified a TLR level and a list of congestion management actions to take, it 1.) notified all Reliability Coordinators in the Eastern Interconnection of the TLR Level, 2.) communicated the list of actions to all Reliability Coordinators in the Eastern Interconnection and those Reliability Coordinators in other Interconnections responsible for curtailing Interchange Transactions crossing Interconnection boundaries identified in the list of congestion management actions, and 3.) requested the Reliability Coordinators identified in Requirement R3 Part 3.2 to implement the congestion management actions identified in Requirement R2 Part 2.1 (R3).

M24. Each Reliability Coordinator shall provide evidence (such as dated logs, voice recordings, or other information in electronic or hard-copy format) that within fifteen minutes of the receipt of a request as described in R32, the Reliability Coordinator complied with the request by either 1.) implementing the communicated congestion management actions requested by the issuing Reliability Coordinator, or 2.) implementing none or some of the communicated congestion management actions requested by the issuing Reliability Coordinator, and replacing the remainder with alternate congestion management actions if assessment showed that some or all of the congestion management actions communicated in R32 would have resulted in a reliability concern or would have been ineffective, the alternate congestion management actions were agreed to by the initiating Reliability Coordinator, and assessment showed that the alternate congestion management actions would not adversely affect reliability (R42).

D. Compliance

1. Compliance Monitoring Process

1.1. Compliance Enforcement Authority

Regional Entity.

1.2. Compliance Monitoring and Enforcement Processes:

The following processes may be used:

- Compliance Audits
- Self-Certifications

- Spot Checking
- Compliance Violation Investigations
- Self-Reporting
- Complaints

1.3. Data Retention

The Reliability Coordinator 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 shall maintain evidence to show compliance with R1 and, R2, ~~R3, and R4~~ for the past 12 months plus the current month.
- If a Reliability Coordinator is found non-compliant, it shall keep information related to the non-compliance until found compliant.

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

1.4. Additional Compliance Information

None.

3. Violation Severity Levels

R #	Lower VSL	Moderate VSL	High VSL	Severe VSL
R1				When acting or instructing others to act to mitigate the magnitude and duration of the instance of exceeding an IROL within that IROL's T_v , the Reliability Coordinator did not initiate one or more of the actions listed under R1 prior to or in conjunction with the initiation of the Eastern Interconnection TLR procedure (or continuing management of this procedure if already initiated).
R2	The Reliability Coordinator initiating the Eastern Interconnection TLR procedure missed identifying the TLR Level and/or a list of congestion management actions to take as specified by the requirement for one clock hour during the period from initiation up to the hour when the TLR level was identified as TLR Level 0.	The Reliability Coordinator initiating the Eastern Interconnection TLR procedure missed identifying the TLR Level and/or a list of congestion management actions to take as specified by the requirement for two clock hours during the period from initiation up to the hour when the TLR level was identified as TLR Level 0.	The Reliability Coordinator initiating the Eastern Interconnection TLR procedure missed identifying the TLR Level and/or a list of congestion management actions to take as specified by the requirement for three clock hours during the period from initiation up to the hour when the TLR level was identified as TLR Level 0.	The Reliability Coordinator initiating the Eastern Interconnection TLR procedure missed identifying the TLR Level and/or a list of congestion management actions to take as specified by the requirement for four or more clock hours during the period from initiation up to the hour when the TLR level was identified as TLR Level 0.

R #	Lower VSL	Moderate VSL	High VSL	Severe VSL
R3	The initiating Reliability Coordinator did not notify one or more Reliability Coordinators in the Eastern Interconnection of the TLR Level (3.1).	N/A	<p>The initiating Reliability Coordinator did not communicate the list of congestion management actions to one or more of the Reliability Coordinators listed in Requirement R3, Part 3.2.</p> <p>OR</p> <p>The initiating Reliability Coordinator requested some, but not all, of the Reliability Coordinators identified in Requirement R3, Part 3.3 to implement the identified congestion management actions.</p>	The initiating Reliability Coordinator requested none of the Reliability Coordinators identified in Requirement R3, Part 3.3 to implement the identified congestion management actions.
R4				The responding Reliability Coordinator did not, within 15 minutes of receiving a request, either 1.) implement all the requested congestion management actions, or 2.) implement none or some of the requested congestion management actions and replace the remainder with alternate congestion

R #	Lower VSL	Moderate VSL	High VSL	Severe VSL
				<p>management actions, provided that: assessment showed that the actions replaced would have resulted in a reliability concern or would have been ineffective, the alternate congestion management actions were agreed to by the initiating Reliability Coordinator, and assessment determined that the alternate congestion management actions would not adversely affect reliability.</p>

E. Variances

None.

F. Associated Documents

Implementation Guideline for Reliability Coordinators:
Eastern Interconnection TLR Levels Reference Document

G. Revision History

Version	Date	Action	Tracking
1		Creation of new standard, incorporating concepts from IRO-006-4 Attachment; elimination of Regional Differences, as the standard allows the use of Market Flow	New
1	April 21, 2011	FERC Order issued approving IRO-006-EAST-1 (approval effective June 27, 2011)	

A. Introduction

1. **Title:** Reliability Coordinator Actions to Operate Within IROLs
2. **Number:** IRO-009-24
3. **Purpose:** To prevent instability, uncontrolled separation, or ~~e~~Cascading ~~outages~~ that adversely impacts the reliability of ~~the the interconnection~~Bulk Electric System by ensuring prompt action to prevent or mitigate instances of exceeding Interconnection Reliability Operating Limits (IROLs).
4. **Applicability:**
 - 4.1. Reliability Coordinator.
5. **Proposed Effective Date:**

~~In those jurisdictions where no regulatory approval is required, the standard shall become effective on the latter of either April 1, 2009 or the first day of the first calendar quarter, three months after BOT adoption.~~

~~In those jurisdictions where regulatory approval is required, the standard shall become effective on the latter of either April 1, 2009 or the first day of the first calendar quarter, three months after applicable regulatory approval.~~

B. Requirements

- 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.~~ (*Violation Risk Factor: Medium*) (*Time Horizon: Operations Planning or Same Day Operations*)
 - R1.1.** ~~That can be implemented in time to prevent exceeding each of the identified~~those IROLs.
 - ~~R1.1-R1.2.~~

~~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) to mitigate the magnitude and duration of exceeding each of the identified that IROLs such that each the IROL is relieved within the IROL's T_v. (*Violation Risk Factor: Medium*) (*Time Horizon: Operations Planning or Same Day Operations*)~~
- R2.** 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. (*Violation Risk Factor: High*) (*Time Horizon: Real-time Operations*)
- R3.** When actual system conditions show that there is ~~an instance of exceeding~~ an IROL ~~exceedance~~ 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 T_v . (*Violation Risk Factor: High*) (*Time Horizon: Real-time Operations*)

- R4. If unanimity cannot be reached on the value for an IROL or its T_v , each Reliability Coordinator that monitors that Facility (or group of Facilities) shall, ~~without delay~~, use the most ~~limitingconservative~~ of the values (~~the value with the least impact on reliability~~) under consideration. (*Violation Risk Factor: High*) (*Time Horizon: Real-time Operations*)

C. Measures

M1. Each Reliability Coordinator shall have, and make available upon request, evidence to confirm that it has Operating Processes, Procedures, or Plans to address both preventing and mitigating instances of exceeding IROLs in accordance with Requirement R1 ~~and Requirement R2~~. This evidence shall include a list of any IROLs (and each associated T_v) identified in advance, along with one or more dated Operating Processes, Procedures, or Plans that that will be used. (R1)

M1.M2. Each Reliability Coordinator shall have, and make available upon request, evidence to demonstrate that it implemented one or more Operating Processes, Procedures or Plans to prevent exceeding an IROL when an assessment of actual or expected system conditions predicted that that an IROL in its Reliability Coordinator area would be exceeded. (R2)

M2.M3. Each Reliability Coordinator shall have, and make available upon request, evidence to confirm that it acted or directed others to act in accordance with Requirement R3 ~~and Requirement R4~~. This evidence could include, but is not limited to, Operating Processes, Procedures, or Plans from Requirement R1, dated operating logs, dated voice recordings, dated transcripts of voice recordings, or other evidence.

M3.M4. For a situation where Reliability Coordinators disagree on the value of an IROL or its T_v the Reliability Coordinator shall have, and make available upon request, evidence to confirm that it used the most ~~limitingconservative~~ of the values under consideration, ~~without delay~~. Such evidence could include, but is not limited to, dated computer printouts, dated operator logs, dated voice recordings, dated transcripts of voice recordings, or other equivalent evidence. (R45)

D. Compliance

1. Compliance Monitoring Process

1.1. Compliance Enforcement Authority

For Reliability Coordinators that work for the Regional Entity, the ERO shall serve as the Compliance Enforcement Authority.

For Reliability Coordinators that do not work for the Regional Entity, the Regional Entity shall serve as the Compliance Enforcement Authority.

1.2. Compliance Monitoring Period and Reset Time Frame

Not applicable.

1.3. Compliance Monitoring and Enforcement Processes

- Compliance Audits
- Self-Certifications
- Spot Checking
- Compliance Violation Investigations
- Self-Reporting
- Complaints
- Exception Reporting

1.4. Data Retention

The Reliability Coordinator, 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 shall retain evidence of Requirements R1, Requirement R2, R3 and R4 and Measures M1, M2, M3 and M4 for a rolling 12 months.

~~The Reliability Coordinator shall retain evidence of Requirement R3, Requirement R4, Requirement R5, Measure M2, and Measure M3 for a rolling 12 months.~~

The Compliance Enforcement Authority shall keep the last audit records and all requested and submitted subsequent audit records, and all IROL Violation Reports submitted since the last audit.

1.5. Additional Compliance Information

Exception Reporting: For each instance of exceeding an IROL for time greater than IROL T_v , the Reliability Coordinator shall submit an IROL Violation Report to its Compliance Enforcement Authority within 30 days of the initiation of the event.

2. Violation Severity Levels

Requirement	Lower	Moderate	High	Severe
R1	<u>N/A</u>	<u>N/A</u>	<u>N/A</u>	<p>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, Part 1.1)</p> <p><u>OR</u></p> <p><u>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 mitigate exceeding that IROL within the IROL's T_v. (R1, Part 1.2)</u></p>
R2				<p>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 mitigate exceeding that IROL within the IROL's T_v.</p>

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Requirement	Lower	Moderate	High	Severe
				(R2)
R23				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)
R34			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 T_v. (R4)Not Applicable	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 T _v . (R 34)
R45	Not applicable.	Not applicable.	Not applicable.	There was a disagreement on the value of the IROL or its T _v and the most conservative limit under consideration was not used. (R 45)

E. Regional Variances

None

F. Associated Documents

IROL Violation Report

Version History

Version	Date	Action	Change Tracking
1	October 17, 2008	Adopted by NERC Board of Trustees	
1	March 17, 2011	Order issued by FERC approving IRO-009-1 (approval effective 5/23/11)	
<u>2</u>	<u>TBD</u>		