

**Implementation Plan for Standard 200 – Operate Within Interconnection Reliability
Operating Limits**

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Prerequisite Approvals

The Determine Facility Ratings, System Operating Limits and Transfer Capabilities Standard must be implemented before this standard can be implemented.

Applicability during Transition to Functional Model

The requirements in Standard 200 apply to entities performing various electric system functions, as defined in the functional model approved by the NERC Board of Trustees in June 2001. NERC is now developing standards and procedures for the identification and certification of such entities. Until that identification and certification is complete, these standards apply to the existing entities (such as control areas, transmission owners and operators, and generation owners and operators) that are currently performing the defined functions.

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Retirement of Sections of Operating Policies

Many elements contained in Standard 200 address the same or similar performance objectives as sections of Operating Policy 2, Operating Policy 4, Operating Policy 5 and Operating Policy 9. To eliminate duplication and minimize confusion, the following sections of existing Operating Policies should be retired when this standard is implemented. Justification for these retirements is provided in the tables on the following pages.

Operating Policy 2:

- Standard A.1
- Standard A.1.2
- Standard A.2
- Requirement A.1 (just last 2 bullets)
- Requirement A.1.1
- Requirement A.1.2
- Requirement B.5

Operating Policy 4:

- Requirement A.1
- Requirement B.3
- Requirement B.3.1
- Requirement B.4
- Requirement B.4.1
- Appendix 4BA

Operating Policy 5:

- Requirement 5.C.1
- Requirement 5.C.2

Operating Policy 9:

- Requirement A.1
- Requirement A.1.1
- Requirement A.1.2

Other Changes:

- Operating Policy 4, Requirement A.2 should be ‘tagged’ to note that the requirement is no longer applicable to system operators working for entities performing the Reliability Authority function, but is still applicable to system operators working for entities performing the Transmission Operator function.

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Policy Retirements or Revisions

The following tables identify the sections of existing Operating Policies that shall be retired when this standard is implemented.

Policy 2 – Transmission Language in Policy	Standard 200 Replacement Requirement
<p>Standard A.1. Basic reliability requirement regarding single contingencies. All CONTROL AREAS shall operate so that instability, uncontrolled separation, or cascading outages will not occur as a result of the most severe single contingency.</p>	<p>204. 1.1 The Reliability Authority shall act or direct others to act to:</p> <ul style="list-style-type: none"> - Prevent instances where Interconnection Reliability Operating Limits may be exceeded - Mitigate the magnitude and duration of instances where Interconnection Reliability Operating Limits have been exceeded
<p>Standard A .1 .2. Operating Security Limits. Operating Security Limits define the acceptable operating boundaries.</p>	<p>201.1 The Reliability Authority shall identify and document which facilities (or groups of facilities) in the Reliability Authority’s reliability area are subject to Interconnection Reliability Operating Limits.</p> <p>201.2 The Reliability Authority shall identify each Interconnection Reliability Operating Limit within the Reliability Authority’s reliability area.</p> <ul style="list-style-type: none"> - The Reliability Authority shall identify a T_v for each Interconnection Reliability Operating Limit.
<p>Standard A.2. Return from OPERATING SECURITY LIMIT Violation. Following a contingency or other event that results in an OPERATING SECURITY LIMIT violation, the CONTROL AREA shall return its transmission system to within OPERATING SECURITY LIMITS soon as possible, but no longer than 30 minutes.</p>	<p>204.1.1 The Reliability Authority shall act or direct others to act to:</p> <ul style="list-style-type: none"> - Prevent instances where Interconnection Reliability Operating Limits may be exceeded - Mitigate the magnitude and duration of instances where Interconnection Reliability Operating Limits have been exceeded

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Policy 2 – Transmission Language in Policy	Standard 200 Replacement
<p>Requirement A.1. Policies for dealing with transmission security. CONTROL AREAS, individually and jointly, shall develop, maintain, and implement formal policies and procedures to provide for transmission security. These policies and procedures shall address the execution and coordination of activities that impact inter- and intra-Regional security, including:</p> <ul style="list-style-type: none"> - Equipment ratings - Monitoring and controlling voltage levels and real and reactive power flows - Switching transmission elements - Planned outages of transmission elements - Development of Operating Security Limits - Responding to OPERATING SECURITY LIMIT violations. 	<p><i>(Only highlighted items should be retired.)</i></p> <p>201.1 The Reliability Authority shall identify and document which Facilities (or groups of Facilities) in its Reliability Authority Area are subject to Interconnection Reliability Operating Limits¹.</p> <p>201.2 The Reliability Authority shall identify Interconnection Reliability Operating Limits for its Reliability Authority Area. Each Interconnection Reliability Operating Limit shall have a T_v that is smaller than or equal to 30 minutes.</p> <p>201.3 All Reliability Authorities that share a Facility (or group of Facilities) subject to an Interconnection Reliability Operating Limit shall agree upon the process used to determine that Interconnection Reliability Operating Limit and its associated T_v</p> <p>207.1.1 The Reliability Authority shall have one or more processes, procedures or plans that identify actions it shall take or actions it shall direct others to take, for both prevention and mitigation of instances of exceeding its Interconnection Reliability Operating Limits.</p> <p><i>(Operating Security Limits that, when exceeded may cause instability and cascading outages on the bulk electric system have now been defined as Interconnection Reliability Operating Limits (IROLs) within this standard.)</i></p>
<p>Requirement A.1.1. Responsibility for transmission security. When OPERATING SECURITY LIMIT violations occur, or are expected to occur, the CONTROL AREAS affected by and the CONTROL AREAS contributing to these violations shall implement established joint actions to restore transmission security.</p>	<p>204.1.1 The Reliability Authority shall, without delay, act or direct others to act to:</p> <ul style="list-style-type: none"> - Prevent instances where Interconnection Reliability Operating Limits may be exceeded - Mitigate the magnitude and duration of instances where Interconnection Reliability Operating Limits have been exceeded

¹ Each IROL is developed by following the requirements in the Determine Facility Ratings, System Operating Limits and Transfer Capabilities Standard.

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Policy 2 – Transmission Language in Policy	Standard 200 Replacement
<p>Requirement A.1.2. Action to keep transmission within limits. CONTROL AREAS shall take all appropriate action up to and including shedding of firm load in order to comply with Standard 2.A.2.</p>	<p>204.1.1 The Reliability Authority shall, without delay, act or direct others to act to:</p> <ul style="list-style-type: none"> - Prevent instances where Interconnection Reliability Operating Limits may be exceeded - Mitigate the magnitude and duration of instances where Interconnection Reliability Operating Limits have been exceeded <p>208.1.1 The Transmission Operator, Balancing Authority and Interchange Authority shall follow the Reliability Authority’s directives to:</p> <ul style="list-style-type: none"> - Prevent instances where Interconnection Reliability Operating Limits may be exceeded - Mitigate the magnitude and duration of instances where Interconnection Reliability Operating Limits have been exceeded
<p>Requirement B.5. Preventing Voltage Collapse. The SYSTEM OPERATOR shall take corrective action, including load reduction, necessary to prevent voltage collapse when reactive resources are insufficient.</p>	<p>204.1.1 The Reliability Authority shall act or direct others to act to:</p> <ul style="list-style-type: none"> - Prevent instances where Interconnection Reliability Operating Limits may be exceeded - Mitigate the magnitude and duration of instances where Interconnection Reliability Operating Limits have been exceeded <p><i>(Note that IROLs may be voltage limits)</i></p>

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<p align="center">Policy 4 – System Coordination</p> <p align="center">Language in Policy</p>	<p align="center">Standard 200 Replacement</p>
<p>Section A – Monitoring System Conditions Requirement A.1 Resources. The system operator shall be kept informed of all generation and transmission resources available for use.</p>	<p><i>Keep for transmission operator’s system operators</i></p> <p>205.1.1 The Reliability Authority shall specify and collect the data it needs to support Real-Time Monitoring, Operational Planning Analyses, and Real-Time Assessments conducted relative to operating within its reliability area’s Interconnection Reliability Operating Limits. The Reliability Authority shall collect this data from the entities performing functions that have Facilities monitored by the Reliability Authority, and from entities that provide Real-time Facility status to the Reliability Authority. This includes specifying and collecting data from the following:</p> <ul style="list-style-type: none"> - Balancing Authorities - Generator Owners - Generator Operators - Reliability Authorities - Transmission Operators - Transmission Owners - Load Serving Entities
<p>Requirement A.2 Transmission status and data. System operators shall monitor transmission line status, MW and MVAR flows, voltage, LTC settings and status of rotating and static reactive resources</p>	<p><i>Keep for transmission operator’s system operators</i></p> <p>202.1.1 The Reliability Authority shall perform Real-time Monitoring of system operating parameters to determine if the Reliability Authority Area is operating within its Interconnection Reliability Operating Limits.</p>

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<p align="center">Policy 4 – System Coordination</p> <p align="center">Language in Policy</p>	<p align="center">Standard 200 Replacement</p>
<p>B3 – Data required from control areas</p> <p>3. Data required from Control Areas. Each CONTROL AREA shall provide its SECURITY COORDINATOR(S) with the Electric System Security Data that is necessary to allow THE SECURITY COORDINATOR(S) to perform its operational security assessments and coordinate reliable operations.</p> <p>3.1 Data. CONTROL AREAS shall provide the types of data as listed in Appendix 4B, “Electric System Security Data, Section A, Electric System Security Data”, unless otherwise agreed to by the CONTROL AREAS and their SECURITY COORDINATOR(S).</p>	<p>206.1.1 Each entity performing one of the following functions shall provide data, as specified, to the Reliability Authority(ies) with which it has a reliability relationship.</p> <ul style="list-style-type: none"> - Balancing Authorities - Generator Owners - Generator Operators - Reliability Authorities - Transmission Operators - Transmission Owners - Load Serving Entities
<p>4. Data exchange among SECURITY COORDINATORS. Upon request, SECURITY COORDINATORS shall, via the ISN, exchange with each other Electric Security Data that is necessary to allow the SECURITY COORDINATORS to perform their operational security assessments and coordinate their reliable operations.</p>	<p>206.1.1 Each entity performing one of the following functions shall provide data, as specified, to the Reliability Authority(ies) with which it has a reliability relationship.</p> <ul style="list-style-type: none"> - Balancing Authorities - Generator Owners - Generator Operators - Reliability Authorities - Transmission Operators - Transmission Owners - Load Serving Entities

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<p align="center">Policy 4 – System Coordination</p> <p align="center">Language in Policy</p>	<p align="center">Standard 200 Replacement</p>
<p>4.1. Data. SECURITY COORDINATORS shall share with each other the types of data as listed in Appendix 4B, “Electric System Security Data, Section A, Electric System Security Data”, unless otherwise agreed to.</p>	<p>206.1.1 Each entity performing one of the following functions shall provide data, as specified, to the Reliability Authority(ies) with which it has a reliability relationship.</p> <ul style="list-style-type: none"> - Balancing Authorities - Generator Owners - Generator Operators - Reliability Authorities - Transmission Operators - Transmission Owners - Load Serving Entities

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<p>Appendix 4BA</p>	<p>205.1.1 The Reliability Authority shall specify and collect the data it needs to support Real-Time Monitoring, Operational Planning Analyses And Real-Time Assessments conducted relative to operating within its Reliability Authority Area’s Interconnection Reliability Operating Limits. The Reliability Authority shall collect this data from the entities performing functions that have Facilities monitored by the Reliability Authority, and from entities that provide Real-time Facility status to the Reliability Authority. This includes specifying and collecting data from the following:</p> <ul style="list-style-type: none"> - Balancing Authorities - Generator Owners - Generator Operators - Reliability Authorities - Transmission Operators - Transmission Owners - Load Serving Entities
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<p>Policy 5 – Emergency Operations Language in Policy</p>	<p>Standard 200 Replacement</p>
<p>Requirement 5.C.1. Relieving security limit violations. Each CONTROL AREA experiencing or materially contributing to an OPERATING SECURITY LIMIT violation shall take immediate steps to relieve the condition.</p>	<p>204.1.1 The Reliability Authority shall, without delay, act or direct others to act to:</p> <ul style="list-style-type: none"> - Prevent instances where Interconnection Reliability Operating Limits may be exceeded - Mitigate the magnitude and duration of instances where Interconnection Reliability Operating Limits have been exceeded <p>208.1.1 The Transmission Operator, Balancing Authority and Interchange Authority shall follow the Reliability Authority’s directives to:</p> <ul style="list-style-type: none"> - Prevent instances where Interconnection Reliability Operating Limits may be exceeded

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	<ul style="list-style-type: none"> - Mitigate the magnitude and duration of instances where Interconnection Reliability Operating Limits have been exceeded
<p>Requirement 5.C.2 Operator authority and responsibility. SYSTEM OPERATORS having responsibility for the reliability of the transmission system within a CONTROL AREA, pool, etc. shall be given and shall exercise specific authority to alleviate OPERATING SECURITY LIMIT violations. The authority shall enable the SYSTEM OPERATOR to take timely and appropriate actions including curtailing transmission service or energy schedules, operating equipment (e.g., generators, phase shifters, breakers), shedding load, etc.</p>	<p>204.1.1 The Reliability Authority shall, without delay, act or direct others to act to:</p> <ul style="list-style-type: none"> - Prevent instances where Interconnection Reliability Operating Limits may be exceeded - Mitigate the magnitude and duration of instances where Interconnection Reliability Operating Limits have been exceeded <p>208.1.1 The Transmission Operator, Balancing Authority And Interchange Authority shall follow the Reliability Authority’s directives to:</p> <ul style="list-style-type: none"> - Prevent instances where Interconnection Reliability Operating Limits may be exceeded - Mitigate the magnitude and duration of instances where Interconnection Reliability Operating Limits have been exceeded

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<p align="center">Policy 9 – Security Coordinator Language in Policy</p>	<p align="center">Standard 200 Replacement</p>
<p>Requirement A.1. Perform security analysis. The RELIABILITY COORDINATORS shall ensure that next-day reliability analyses are performed simultaneously for all CONTROL AREAS and TRANSMISSION PROVIDERS in its RELIABILITY AREA to ensure that the bulk power system can be operated in anticipated normal and contingency conditions.</p>	<p>203.1.1 The Reliability Authority shall perform Operational Planning Analyses to assess whether the planned bulk electric system operations within its Reliability Authority Area will exceed any of its Interconnection Reliability Operating Limits.</p> <p>203.1.2 The Reliability Authority shall perform Real-Time Assessments to determine if its Reliability Authority Area is exceeding any Interconnection Reliability Operating Limits or is expected to exceed any Interconnection Reliability Operating Limits.</p>
<p>1.1. Information sharing. Each CONTROL AREA in the SECURITY AREA shall provide information required for system studies, such as critical facility status, load, generation, operating reserve projections, and known INTERCHANGE TRANSACTIONS. This information shall be available by 1200 Central Standard Time for the Eastern Interconnection, and 1200 Pacific Standard Time for the Western Interconnection.</p>	<p>206.1.1 Each entity performing one of the following functions shall provide data, as specified, to the Reliability Authority(ies) with which it has a reliability relationship.</p> <ul style="list-style-type: none"> - Balancing Authority - Generator Owners - Generator Operators - Reliability Authorities - Transmission Operators - Transmission Owners - Load Serving Entities <p><i>(Note that this data is only a subset of the data addressed in Policy 9 Requirement A.1.1.1)</i></p>

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<p>Requirement A.1.2. System Studies. The RELIABILITY COORDINATORS shall conduct studies to identify potential interface and other OPERATING RELIABILITY LIMIT violations, including overloaded transmission lines and transformers, voltage and stability limits, etc.</p>	<p>203.1.1 The Reliability Authority shall perform Operational Planning Analyses to assess whether the planned bulk electric system operations within its Reliability Authority Area will exceed any of its Interconnection Reliability Operating Limits.</p> <p>203.1.2 The Reliability Authority shall Perform Real-Time Assessments to determine if its Reliability Authority Area is exceeding any Interconnection Reliability Operating Limits or is expected to exceed any Interconnection Reliability Operating Limits.</p>
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Compliance with Standard

Requirement	Functions that Must Comply With the Requirements							
	Reliability Authority	Balancing Authority	Interchange Authority	Transmission Operator	Transmission Owner	Generator Owner	Generator Operator	Load Serving Entity
201 IROL Identification	X							
202 Monitoring	X							
203 Analyses & Assessments	X							
204 Actions	X							
205 Data Specification & Collection	X							
206 Data Provision	X	X		X	X	X	X	X
207 Processes, Procedures or Plans	X							
208 RA Directives		X	X	X				

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Phased-in Compliance

The following table identifies the implementation date and the earliest compliance date for each requirement.

The implementation date is the date entities are expected to begin meeting the performance identified in this standard. Because this standard rests upon the communication of system operating limits as defined in Requirement 204 - 604 Communication of System Operating Limits, the compliance dates are fixed from that date. Additional time (preparation time) has been added to give entities time needed to fully comply with the requirements. The justification for the staggered effective dates is in the tables on the following pages.

Requirement	Effective Date	Compliance Date
201 - IROL Identification	3 months from BOT adoption	6 months from implementation of Requirement 604
202 – Monitoring	3 months from BOT adoption	6 months from implementation of Requirement 604
203 - Analyses and Assessments	3 months from BOT adoption	6 months from implementation of Requirement 604
204 - Actions	3 months from BOT adoption	6 months from implementation of Requirement 604
205 – Data Specification & Collection	3 months from BOT adoption	9 months from implementation of Requirement 604
206 – Data Provision	3 months from BOT adoption	12 months from implementation of Requirement 604
207 – Processes, Procedures or Plans	3 months from BOT adoption	6 months from implementation of Requirement 604
208 – Reliability Authority Directives	3 months from BOT adoption	9 months from implementation of Requirement 604

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Requirement 201 – IROL Identification		
Measure	Description	Preparation
201.1	<p>The Reliability Authority shall have a list of Facilities (or group of Facilities) in its Reliability Authority Area that are subject to Interconnection Reliability Operating Limits.</p> <p>(i) The Reliability Authority shall have evidence it has reviewed and updated its list of Facilities (or groups of Facilities) to reflect changes in its Reliability Authority Area’s system topology.</p>	<p>This should already be done in some format to comply with current field testing of IRLs and to comply with existing Operating Policy – only additional time needed would be to produce some evidence that list has been updated</p>
201.2	<p>The Reliability Authority shall be able to identify the current values of the Interconnection Reliability Operating Limits it monitors. Each of these Interconnection Reliability Operating Limits shall have a T_v that is smaller than or equal to 30 minutes.</p> <p>(i) The Reliability Authorities that share a Facility (or group of Facilities) shall have an agreed upon process for determining if that Facility (or group of Facilities) is subject to an Interconnection Reliability Operating Limit and for determining the value of that Interconnection Reliability Operating Limit and its associated T_v.</p>	<p>Current policy has a 30-minute response time for all limits. Entities may need additional time to establish variable T_vs for IROLs. This should be done within 6 months.</p> <p>This should already be done in some format to comply with current field testing of IRLs and to comply with existing Operating Policy – only additional time needed would be to put produce some evidence that list has been updated and this could be done in less than a week if needed.</p>
201.3	<p>The Reliability Authority shall be able to demonstrate that its Interconnection Reliability Operating Limit values and their T_v reflect current system conditions.</p>	<p>This should not require any additional work – if limits are being updated to reflect ‘current’ conditions today, then the ability exists.</p>

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Requirement 202 – Monitoring		
Measure	Description	Preparation
202.1	The Reliability Authority shall have a list of Facilities (or groups of Facilities) subject to IROLs available for its operations personnel’s Real-time use.	This should already be done in some format to comply with current field testing of IRLs and to comply with existing Operating Policy – only additional time needed would be to produce some evidence that list has been updated
202.2.	The Reliability Authority shall have Interconnection Reliability Operating Limits available for its operations personnel’s Real-time use.	This should already be done in some format to comply with existing Operating Policy – only additional time needed would be to re-title the limits as IROLs.
202.3	The Reliability Authority shall have Real-time Data available in a form that system operators can compare to the Interconnection Reliability Operating Limits.	This should already be done in some format to comply with existing Operating Policy – only additional time needed would be to let system operators know that the limits are called IROLs and may have unique T _v s.
202..4	The Reliability Authority shall monitor real-time system operating parameters and compare these against its Interconnection Reliability Operating Limits.	This should already be done in some format to comply with existing Operating Policy – only additional time needed would be to let system operators know that the limits are called IROLs and may have unique T _v s.

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Requirement 203 – Analyses and Assessments		
Measure	Description	Preparation
203..1	The Reliability Authority shall identify operating situations or events that impact its Reliability Authority Area’s ability to operate without exceeding any Interconnection Reliability Operating Limits.	This should already be done in some format to comply with existing Operating Policy – only additional time needed would be to let system operations personnel know that the limits are called IROLs and may have unique T _v s.
203.1.i.	The Reliability Authority shall conduct an Operational Planning Analysis at least once each day, evaluating the next day’s projected system operating conditions.	This should already be done to comply with existing Operating Policy – current operating practice in many locations is to do the analysis each day for the day ahead only on weekdays, and to do the ‘weekend ahead’ on Friday. Many entities do not conduct an operational planning analysis on Saturday or Sunday for Sunday and Monday. Entities may need some time to train additional personnel so that the analysis could be conducted every day of the week.
203.1ii	The Reliability Authority shall conduct a Real-time Assessment periodically, but at least once every 30 minutes.	This should already be done to comply with existing Operating Policy – only additional time needed would be to let system operators know that the limits are called IROLs and may have unique T _v s and to identify that the assessment must be conducted at least once every 30 minutes.

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Requirement 204 - Actions		
Measure	Description	Preparation
204.1.1	<p>The Reliability Authority shall have documentation to support each instance where actions were taken or directives were issued to mitigate the magnitude and duration of exceeding an Interconnection Reliability Operating Limit.</p> <p>(i) The documentation shall include the actions taken or directives issued, the magnitude of the event, and the duration of the event. (This data may be from an operating log, may be from the entity’s energy management system, or may be from some other source.)</p>	<p>This requires that the system operators know which of their limits are IROLs. The actions are done today to comply with Operating Policy.</p>
204.2.	<p>The Reliability Authority shall report each instance of exceeding an Interconnection Reliability Operating Limit for time greater than T_v:</p> <p>(i) The Reliability Authority shall complete an Interconnection Reliability Operating Limit Violation Report and shall file the report with its Compliance Monitor within five business days of the initiation of the event. (The report includes the date and time of the event; identification of which Interconnection Reliability Operating Limit was violated and the T_v for that limit; magnitude and duration of exceeding the Interconnection Reliability Operating Limit after exceeding T_v; actions taken or directives issued and the time these were initiated or issued; explanation of results of actions or directives.)</p>	<p>This requires that the system operators know which of their limits are IROLs. The actions are done today to comply with Operating Policy.</p> <p>This also requires that the Compliance Enforcement Program accept the IROL Violation Report developed by the IROL SDT. The report collects only the information identified in the measure.</p> <p>This also requires that the RA know which entity is acting as its compliance monitor.</p> <p>This also requires that the IROL Violation Report be made available to the RAs.</p>

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Requirement 205 – Data Specification & Collection		
Measure	Description	Preparation
205..1	<p>The Reliability Authority shall have a documented specification for data needed to build and maintain models needed to support real time monitoring, operational planning analyses and real time assessments relative to Interconnection Reliability Operating Limits.</p> <p>(i) Specification shall include a list of required data, a mutually agreeable format, and timeframe and periodicity for providing data.</p>	<p>Many entities may not have a data specification in place. The data specification may be distributed in several other documents, and entities may need time to assemble this. Since the data needed is known, even if it is not formally documented, it should be possible to accomplish this documentation within 9 months – this includes time to come to ‘mutual agreement’ with other entities.</p>
205.1.ii	<p>Specification shall address the data provision process to use when automated real-time system operating data is unavailable.</p>	<p>This may not exist and may need to be developed. It should be possible to develop this within the 9 month period identified for developing the complete data specification.</p>
205.2	<p>The Reliability Authority shall have evidence that it has distributed its data specification to the entities that have Facilities monitored by the Reliability Authority and to entities that provide Real-time Facility status to the Reliability Authority.</p>	<p>This requires documentation that wouldn’t be available until after the data specification were completed. This should be done no later than 10 months after the standard is approved – this allows 9 months to develop the specification, and then a month to deliver it.</p>
205..3	<p>The Reliability Authority shall notify its Compliance Monitor when an entity that has Facilities monitored by the Reliability Authority, or an entity that provides Real-time Facility status to the Reliability Authority, does not provide data as specified and the Reliability Authority was unable to resolve the issue with the entity responsible for providing the data .</p>	<p>This requires that the data specification be developed and distributed. This should come into affect a year after the standard is approved. This allows entities some time to ‘field test’ their data specification before compliance is a factor.</p>
205..3.i	<p>If the Reliability Authority does not receive data as specified and is unable to resolve the situation, then the Reliability Authority shall notify its Compliance Monitor within five business days of discovering that the data is missing.</p>	<p>This also requires that the RA know which entity is acting as its compliance monitor.</p>

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Requirement 206 – Data Provision		
Measure	Description	Preparation
206.2.1	The entity responsible shall have evidence that it has provided data, as specified, to the requesting Reliability Authority, within the time frame specified, in the mutually agreed upon format.	The Data Specification in requirement 205 needs to be in place before this can be implemented. There should be a 12 month delay in implementing compliance with this measure. This allows entities time to work with their RA to come to agreement with a ‘mutually acceptable format’ and gives the entities that must provide the RA with data a 3 month trial and error period for providing data before there is any compliance measurement.

Requirement 207 – Processes, Procedures or Plans		
Measure	Description	Preparation
207.2.1	The Reliability Authority shall have one or more documented processes, procedures, or plans that identify both preventing and mitigating instances of exceeding Interconnection Reliability Operating Limits. The processes, procedures, or plans shall identify and be coordinated with those entities responsible for taking actions and with those entities impacted by such actions.	Entities should have this plan in place now. A six-month delay in compliance should allow everyone time to develop a plan if it doesn’t already exist.

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Requirement 208 – Reliability Authority Directives		
Measure	Description	Preparation
208.2.1	<p>The responsible entity shall follow the Reliability Authority’s directives and shall document the directives and actions taken to meet the directives.</p> <p>The responsible entity shall document via an operations log or other data source, the following for each directive it receives relative to an Interconnection Reliability Operating Limit:</p> <ul style="list-style-type: none">- Date and time of directive received- Directive issued- Actions taken in response to directive	<p>This should already be done and no additional time for preparation should be needed.</p>