

Implementation Plan and Mapping Document

~~for IRO-001-3 – Reliability Coordination~~ – Responsibilities and Authorities

Approvals Requested Approval

The RC SDT requests the approval of IRO-001-3 – Reliability Coordination – Responsibilities and Authorities.

Requested Retirement

The RC SDT request the retirement of standard IRO-001-2 – Responsibilities and Authorities, Requirements R1 and R2, and the associated sub-requirements.

Prerequisite Approvals

- None.

Defined Terms in the NERC Glossary

The RC SDT proposes the following new definition:

Reliability Directive: A communication initiated by a Reliability Coordinator, Transmission Operator or Balancing Authority where action by the recipient is necessary to address an Emergency or Adverse Reliability Impact.

Conforming Changes to Requirements in Already Approved Standards

- None.

Revision Summary

The RC SDT is proposing the following revisions. Requirement, R1 will be retired because it is addressed in the NERC Rules of Procedure, Section 501 and 503. Requirements, R2 and R5 are proposed for retirement. Requirement, R3 will become the new Requirement R1, the authority to act and direct others to act, which may include Reliability Directives. Requirement, R4 is proposed for retirement because it is redundant with the NERC Rules of Procedure, Section 501 and 508. Requirement, R6 is proposed for retirement because PER-003-0 provides the necessary reliability replacement with no gap in reliability. Requirement, R7 is proposed for retirement because IRO-014-2, R1 provides the necessary reliability replacement with no gap in reliability. Requirement, R8 is proposed for replacement by the new IRO-001-3, Requirement R2 and R3. Requirements, R9 is proposed for retirement because it is redundant with other requirements and it is covered under the Reliability Coordinator’s Standard of Conduct.

Applicable Entities

- Reliability Coordinator
- Balancing Authority
- Transmission Operator Generator Operator
- Distribution Provider
 - ~~The RC SDT revised the standard and is proposing retiring six requirements (R2, R4, R5, R6, R7 and R9). Changes were made to eliminate redundancies between standards (existing and proposed), to align with NERC's Rules of Procedure and to address issues in FERC Order 693.~~

Effective Dates

~~The first day of the second calendar quarter beyond the date that this standard is approved by applicable regulatory authorities, or in~~ those jurisdictions where regulatory approval is not required, the standard becomes ~~IRO-001-3 shall become effective on the first day of the second calendar quarter after applicable regulatory approval. In those jurisdictions where no regulatory approval is required, this standard shall become~~ effective on the first day of the first calendar quarter beyond the date this standard is approved by the NERC ~~After~~ Board of Trustees, or as otherwise made effective pursuant ~~approval.~~

Retirements

~~IRO-001-2 should be retired at midnight of the day immediately prior to the laws applicable to such ERO governmental authorities. Effective Date of IRO-001-3 in the particular jurisdiction in which the new standard is becoming effective.~~

New or Revised Standard

<u>IRO-001-3</u>	<u>In those jurisdictions where regulatory approval is required, this standard shall become effective on the first day of the second calendar quarter after applicable regulatory approval. In those jurisdictions where no regulatory approval is required, this standard shall become effective on the first day of the first calendar quarter after Board of Trustees adoption.</u>
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Standard for Retirement

<u>IRO-001-2</u>	<u>Midnight of the day immediately prior to the Effective Date of IRO-001-3 in the particular Jurisdiction in which the new standard is becoming effective.</u>
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Implementation Plan for Definition

Reliability Directive: Entities shall use this definition when implementing the standard IRO-001-3, which uses this defined term.

Revisions or Retirements to Already Approved Standards

The following tables identify the sections of approved standards that shall be retired or revised when this standard becomes effective~~is implemented~~. If the drafting team is recommending the retirement or revision of a requirement, that text is blue.

Already Approved Standard	Proposed Replacement Requirement(s)
<p>IRO-001-1</p> <p>R1. Each Regional Reliability Organization, subregion, or interregional coordinating group shall establish one or more Reliability Coordinators to continuously assess transmission reliability and coordinate emergency operations among the operating entities within the region and across the regional boundaries. <i>[Violation Risk Factor: High]</i></p>	<p><u>The RC SDT proposes retiring the</u>This requirement was retired as it is addressed in the NERC Rules of Procedure, <u>March 15, 2012:</u></p> <p>Section 503, item 2 (-2.1):</p> <p>“Regional Entitiesentities shall verify that all Reliability Coordinators, Balancing Authorities, balancing authorities and Transmission Operators meet the Registration requirements of Section 501(1.4).”</p> <p><u>Section 501 (1.4)</u></p> <p><u>“1.4 For all geographical or electrical areas of the Bulk Power System, the Registration process shall ensure that (1) no areas are lacking any entities to perform the duties and tasks identified in and required by the Reliability Standards to the fullest extent practical, and (2) there is no unnecessary duplication of such coverage or of required oversight of such coverage. In particular the process shall:</u></p> <p style="padding-left: 40px;"><u>1.4.1 Ensure that all areas are under the oversight of one and only one Reliability Coordinator.</u></p> <p style="padding-left: 40px;"><u>1.4.2 Ensure that all Balancing Authorities and Transmission Operator entities¹transmission operators are under the responsibility of one and only one Reliability Coordinator. a reliability coordinator”²</u></p> <p style="padding-left: 40px;"><u>1.4.3 Ensure that all transmission Facilities of the Bulk Power</u></p>

¹ Some organizations perform the listed functions (e.g., Balancing Authority, Transmission Operator) over areas that transcend the Footprints of more than one Reliability Coordinator. Such organizations will have multiple Registrations, with each such Registration corresponding to that portion of the organization’s overall area that is within the Footprint of a particular Reliability Coordinator.

	<p><u>System are the responsibility and under the control of one and only one Transmission Planner, Planning Authority, and Transmission Operator.</u></p> <p><u>1.4.4 Ensure that all loads and generators are under the responsibility and control of one and only one Balancing Authority.”R1.—</u></p>
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Notes:

Already Approved Standard	Proposed Replacement Requirement(s)
<p>IRO-001-1</p> <p>R2.- The Reliability Coordinator shall comply with a regional reliability plan approved by the NERC Operating Committee. <i>[Violation Risk Factor: High]</i></p> <p>R5. -The Reliability Coordinator shall list within its reliability plan all entities to which the Reliability Coordinator has delegated required tasks. <i>[Violation Risk Factor: Lower]</i></p>	<p>IRO-001-2</p> <p>None – The RC SDT proposes retiring thethese requirements.</p>

Notes: The RC SDT proposes retiring R2 and R5 as the regional reliability plan is a “how” document that shows how a Reliability Coordinator~~an RC~~ will comply with all other NERC Standards, making this requirement redundant.

Already Approved Standard	Proposed Replacement Requirement(s)
<p>IRO-001-1</p> <p>R3. The Reliability Coordinator shall have clear decision-making authority to act and direct actions to be taken by Transmission Operators, Balancing Authorities, Generator Operators, Transmission Service Providers, Load-Serving Entities and Purchasing-Selling Entities within its Reliability Coordinator Area to preserve the integrity and reliability of the Bulk Electric System. These actions shall be taken without delay, but no</p>	<p>IRO-001-32</p> <p>R1. —Each Reliability Coordinator shall take have the authority to actions or direct others to actions (which could include issuing Reliability Directives) by Transmission Operators, Balancing Authorities, Generator Operators, and Distribution Providers within its Reliability Coordinator Area to prevent identified events or mitigate the magnitude or duration of actual events that result in an Emergency or Adverse</p>

longer than 30 minutes. <i>[Violation Risk Factor: High]</i>	Reliability Impacts. [Violation Risk Factor: High] [Time Horizon: Real-time Operations, Same Day Operations and Operations Planning]
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Notes:

- The RC SDT is proposing that the last sentence of R3 be retired. The timing of RC response to events varies based on system conditions. The specific timing criteria for responses to IROLs are contained in other standards (e.g., TOP-007, R2).
- ~~The Distribution Provider was added as an applicable entity per FERC Order 693. This will add clarity and measurability to the standard. The last part of the second sentence should be removed as it is implicit in IRO-001-1, R1, which states that the Reliability Coordination will act or direct actions to mitigate issues. Additionally, stakeholders indicated issues with the ability to measure compliance with the phrase, “without intentional delay” and this was removed.~~

Already Approved Standard	Proposed Replacement Requirement(s)
<p>IRO-001-1</p> <p>R4. Reliability Coordinators that delegate tasks to other entities shall have formal operating agreements with each entity to which tasks are delegated. The Reliability Coordinator shall verify that all delegated tasks are understood, communicated, and addressed within its Reliability Coordinator Area. All responsibilities for complying with NERC and regional standards applicable to Reliability Coordinators shall remain with the Reliability Coordinator. <i>[Violation Risk Factor: Medium]</i></p>	<p>IRO-001-2</p> <p>None – The RC SDT proposes retiring retire the requirement.</p> <p>RC SDT contendsproposes that original IRO-001-1, R4 is redundant with NERC Rules of Procedure, Sectionsection 500 <u>(March 15, 2012)</u> and should be retired from the standard.</p> <p>(–Section 501)–states:</p> <p>“The purpose of the <u>Organization Registration Program</u> iscompliance registry will be to clearly identify those entities that are responsible for compliance with <u>the FERC approved Reliability Standards</u>reliability standards. Organizations <u>that are registered are included</u>listed on the <u>NERC Compliance Registry (NCR) and are</u>registry will be responsible for knowing the content of and for complying with <u>all applicable Reliability Standards</u>the NERC reliability standards.”</p>

(Section 508)

Provisions Relating to Coordinated Functional Registration (CFR) Entities

In addition to registering as an entity responsible for all functions that it performs itself, multiple Also, section 507, item 2 addresses written agreements;

Joint registration pursuant to written agreement.

~~“Where a JRO and any of its members or related entities may each register using a CFR agree, in writing, upon a division of compliance responsibility among them for one or more Reliability Standard(s) reliability standard(s) applicable to a particular function, and/or for one or more Requirements/sub-Requirements requirements within particular Reliability Standard reliability standard(s) applicable to a specific), both the JRO and such member(s) or related entity(ies) shall register as an organization responsible for that function. The CFR submission JRO and its member(s) or related entity(ies) must include have a written agreement that governs itself and clearly specifies the entities’ their respective compliance responsibilities. The Registration, which shall be submitted as part of the CFR is the complete Registration for each entity. Additionally, each entity shall take full compliance responsibility for those Reliability Standards and/or Requirements/sub-Requirements it has registered for in the CFR. joint registration. Neither NERC nor the Regional Entity regional entity shall be parties to any such agreement, between a JRO and its member or related entity(ies), nor shall NERC or the Regional Entity regional entity have responsibility for reviewing or approving any such agreement, other than to verify that the agreement provides for an allocation or assignment of responsibilities -consistent with the CFR. joint registration.”~~

Notes: ~~Section 508 addresses written agreements~~The RC SDT recommends the retirement of IRO-001-1 R4.

Already Approved Standard	Proposed Replacement Requirement(s)
<p>IRO-001-1 R6.- The Reliability Coordinator shall verify that all delegated tasks are carried out by NERC-certified Reliability Coordinator operating personnel. <i>[Violation Risk Factor: Medium]</i></p>	<p>IRO-001-2 None – The RC SDT proposes retiring therequirement because it is <u>covered by PER-003-0, R1.</u>redundant with:</p> <p>PER-003-0 R1. Each Transmission Operator, Balancing Authority, and Reliability Coordinator shall staff all operating positions that meet both of the following criteria with personnel that are NERC certified for the applicable functions:</p> <p>R1.1. Positions that have the primary responsibility, either directly or through communications with others, for the real-time operation of the interconnected Bulk Electric System.</p> <p>R1.2. Positions directly responsible for complying with NERC standards.</p>

Notes: The RC SDT recommends retiring IRO-001-1, R6 as it is redundant with PER-003-0, R1, R1.1., and R1.2.

Already Approved Standard	Proposed Replacement Requirement(s)
<p>IRO-001-1 R7.- The Reliability Coordinator shall have clear, comprehensive coordination agreements with adjacent Reliability Coordinators to ensure that System Operating Limit (SOL) or Interconnection Reliability Operating Limit (IROL) violation mitigation requiring actions in adjacent Reliability Coordinator Areas are coordinated. <i>[Violation Risk Factor: High]</i></p>	<p>IRO-001-2 None – The RC SDT proposes retiring therequirement should be retiredbecause it is <u>covered by IRO-014-2, R1.</u>redundant with:</p> <p>IRO-014-2 R1. Each Reliability Coordinator shall have Operating Procedures, Operating Processes, or Operating Plans for activities that require notification, exchange of information or coordination of actions that may impact other Reliability</p>

	<p>Coordinator Areas to support Interconnection reliability. These Operating Procedures, Processes, or Plans shall collectively address the following: <i>[Violation Risk Factor: Medium] [Time Horizon: Same Day Operations and Operations Planning]</i></p>
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Notes: The RC SDT ~~proposes retiring~~recommends the retirement of IRO-001-1, R7 as this is redundant with IRO-014-1 R1.

Already Approved Standard	Proposed Replacement Requirement(s)
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IRO-001-1

R8: Transmission Operators, Balancing Authorities, Generator Operators, Transmission Service Providers, Load-Serving Entities, and Purchasing-Selling Entities shall comply with Reliability Coordinator directives unless such actions would violate safety, equipment, or regulatory or statutory requirements. Under these circumstances, the Transmission Operator, Balancing Authority, Generator Operator, Transmission Service Provider, Load-Serving Entity, or Purchasing-Selling Entity shall immediately inform the Reliability Coordinator of the inability to perform the directive so that the Reliability Coordinator may implement alternate remedial actions. *[Violation Risk Factor: High]*

IRO-001-~~3~~2

R2. ~~_____~~ Each Transmission Operator, Balancing Authority, Generator Operator, and Distribution Provider shall comply with its Reliability Coordinator’s direction ~~in accordance with Requirement R2~~ unless compliance with ~~the direction in accordance with Requirement R2~~ the direction cannot be physically implemented or unless such actions would violate safety, equipment, regulatory or statutory requirements. *[Violation Risk Factor: High] [Time Horizon: Real-time Operations, Same Day Operations and Operations Planning]*

R3. R4. Each Transmission Operator, Balancing Authority, Generator Operator, and Distribution Provider shall inform its Reliability Coordinator upon recognition of its inability to perform as directed in accordance with Requirement R2. *[Violation Risk Factor: High] [Time Horizon: Real-time Operations, Same Day Operations and Operations Planning]*

Notes: The RC SDT added the Distribution Provider per FERC Order 693 ~~and added the blue text shown in the requirements above.~~ The RC SDT proposes the replacement of IRO-001-1, R8 with two requirements IRO-001-~~3~~, R2, and~~2~~, R3, and~~4~~. ~~This will add clarity and measurability to the standard.~~

The ~~Distribution Provider~~ last part of the second sentence should be removed as it is implicit in R1, which states that the Reliability Coordinator will act or direct actions to mitigate issues. Stakeholders indicated issues with the ability to measure compliance with the phrase, “without intentional delay” and this was ~~added as an applicable entity per FERC Order 693~~ removed.

Relating to First Energy’s comment in FERC Order 693, the requirements address both personnel safety and equipment. There is no reference to a chain of command in the requirements. The standard is written such that decision-making authority rests with the Reliability Coordinator. No further revisions to the standard are required.

Already Approved Standard	Proposed Replacement Requirement(s)
<p>IRO-001-1 R9. The Reliability Coordinator shall act in the interests of reliability for the overall Reliability Coordinator Area and the Interconnection before the interests of any other entity. <i>[Violation Risk Factor: High]</i></p>	<p>IRO-001-2 None – Retire retire the requirement <u>because it is</u> redundant.</p>

Notes: The RC SDT proposes retiring this requirement. All Reliability Coordinator Standard Requirements are developed so that the Reliability Coordinator shall act in the interest of reliability for the RC Area and the Interconnection. Section 6 of the NERC Standard Development Procedure states that NERC develops and maintains Reliability Standards. Equity issues are covered under the Reliability Coordinator Standards of Conduct.

Functions that Must Comply with the Requirements in the Standards

Standard	Functions that Must Comply With the Requirements							
	Reliability Coordinator	Balancing Authority	Distribution Provider	Transmission Operator	Transmission Service Provider	Purchasing Selling Entity	Generator Operator	Load Serving Entity
IRO-001-2	X	X	X	X			X	

