

Implementation Plan and Mapping Document for IRO-001-3 - Reliability Coordination — Responsibilities and Authorities

Approvals Requested

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

Prerequisite Approvals

- None

Conforming Changes to Requirements in Already Approved Standards

- None

Revision Summary

- 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 NERCs Rules of Procedure and to address issues in FERC Order 693.

Effective Dates

In those jurisdictions where regulatory approval is required, 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 after Board of Trustees approval.

Retirements

IRO-001-2 should be retired at 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.

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 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>This requirement was retired as it is addressed in the NERC Rules of Procedure, Section 503, item 2.2:</p> <p>“Regional entities shall verify that all balancing authorities and transmission operators are under the responsibility of a reliability coordinator”</p> <p>R1.</p>
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-001-3</p> <p>None – The RC SDT proposes retiring these requirements.</p>
Notes: The RC SDT proposes retiring R2 and R5 as the regional reliability plan is a “how” document that shows how 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</p>	<p>IRO-001-3</p> <p>R1. Each Reliability Coordinator shall take have the authority to actions or direct others to actions (which</p>

<p>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 longer than 30 minutes. <i>[Violation Risk Factor: High]</i></p>	<p>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 Reliability Impacts. [Violation Risk Factor: High][Time Horizon: Real-time Operations, Same Day Operations and Operations Planning]</p>
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<p>Notes:</p> <ul style="list-style-type: none"> • 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.

<p>Already Approved Standard</p>	<p>Proposed Replacement Requirement(s)</p>
<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-001-3</p> <p>None – retire the requirement</p> <p>RC SDT proposes that original IRO-001-1, R4 is redundant with NERC Rules of Procedure, section 500 and should be retired from the standard. Section 501 states:</p> <p>“The purpose of the compliance registry will be to clearly identify those entities that are responsible for compliance with reliability standards. Organizations listed on the registry will be responsible for knowing the content of and for complying with the NERC reliability standards.”</p> <p>Also, section 507, item 2 addresses written agreements;</p> <p>Joint registration pursuant to written agreement.</p>

“Where a JRO and any of its members or related entities agree, in writing, upon a division of compliance responsibility among them for one or more reliability standard(s) applicable to a particular function, and/or for one or more requirements within particular reliability standard(s), both the JRO and such member(s) or related entity(ies) shall register as an organization responsible for that function. The JRO and its member(s) or related entity(ies) must have a written agreement that clearly specifies their respective responsibilities, which shall be submitted as part of the joint registration. Neither NERC nor the 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 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 joint registration.”

Notes: 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-001-3 None – retire requirement because it is redundant with: 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: 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>

R1.2. Positions directly responsible for complying with NERC standards.

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

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-001-3 None – requirement should be retired because it is redundant with: 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 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>

Notes: The RC SDT recommends the retirement of IRO-001-1 R7 as this is redundant with IRO-014-1 R1.

Already Approved Standard	Proposed Replacement Requirement(s)
<p>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</p>	<p>IRO-001-3 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</p>

<p>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. <i>[Violation Risk Factor: High]</i></p>	<p>safety, equipment, regulatory or statutory requirements. <i>[Violation Risk Factor: High]</i> <i>[Time Horizon: Real-time Operations, Same Day Operations and Operations Planning]</i></p> <p>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. <i>[Violation Risk Factor: High]</i> <i>[Time Horizon: Real-time Operations, Same Day Operations and Operations Planning]</i></p>
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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, R3, and R4. This will add clarity and measurability to the standard. The last part of the second sentence should be removed as it is implicit in R1, which states that the Reliability Coordination 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 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</p> <p>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-001-3</p> <p>None – retire the requirement as 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-001-3	X	X	X	X			X	