

## Review of IRO-010-1a—Reliability Coordinator Data Specification and Collection (Deferred)

<http://www.nerc.com/files/IRO-010-1a.pdf>

### VRFs for Requirements R1 and R2:

Standard, Requirement	Requirement Language	VRF Assignment	Comments
IRO-010-1a, R1	<p>The Reliability Coordinator shall have a documented specification for data and information to build and maintain models to support Real-time monitoring, Operational Planning Analyses, and Real-time Assessments of its Reliability Coordinator Area to prevent instability, uncontrolled separation, and cascading outages. The specification shall include the following:</p> <p><b>R1.1.</b> List of required data and information needed by the Reliability Coordinator to support Real-Time Monitoring, Operational Planning Analyses, and Real-Time Assessments.</p> <p><b>R1.2.</b> Mutually agreeable format.</p> <p><b>R1.3.</b> Timeframe and periodicity for providing data and information (based on its hardware and software requirements, and the time needed to do its Operational</p>	<del>Lower</del> Medium	<p>FERC cited possible inconsistencies with Guidelines 1, 3, and 4. With respect to Guideline 3, FERC was concerned about parallels between IRO-010-1a R1 and R2 and IRO-008-1 R1 and R2 and IRO-009-1 R1 and R5. FERC sees them as parallel requirements, and is concerned that they are not assigned the same VRFs (all of the other requirements are assigned Medium or High VRFs).</p> <p>While NERC staff does not see IRO-008, IRO-009, and IRO-010 as directly comparable (the first two deal with the performance of assessments and action plans, while the third deals with documented specifications), IRO-010-1a R1 is not purely administrative and should thus be changed to a Medium VRF.</p>

	<p>Planning Analyses).</p> <p><b>R1.4.</b> Process for data provision when automated Real-Time system operating data is unavailable.</p>		
IRO-010-1a, R2	<p>The Reliability Coordinator shall distribute its data specification to entities that have Facilities monitored by the Reliability Coordinator and to entities that provide Facility status to the Reliability Coordinator.</p>	<p><del>Lower</del> <u>Medium</u></p>	<p>FERC cited possible inconsistencies with Guidelines 1, 3, and 4. With respect to Guideline 3, FERC was concerned about parallels between IRO-010-1a R1 and R2 and IRO-008-1 R1 and R2 and IRO-009-1 R1 and R5. FERC sees them as parallel requirements, and is concerned that they are not assigned the same VRFs (all of the other requirements are assigned Medium or High VRFs).</p> <p>While NERC staff does not see IRO-008, IRO-009, and IRO-010 as directly comparable (the first two deal with the performance of assessments and action plans while the third deals with documented specifications), IRO-010-1a R2 is not purely administrative and should thus be changed to a Medium VRF.</p>

**Original R1 and R2 VRF Guideline Explanation from [December 31, 2009 IRO-010-1a Petition](#):**

The following discussion addresses how the drafting team considered FERC’s VSL Guidelines 2 through 5. The team did not address Guideline 1 directly because of an apparent conflict between Guidelines 1 and 4. Whereas Guideline 1 identifies a list of topics that encompass nearly all topics within NERC’s Reliability Standards and implies that these requirements should be assigned a “High” VRF, Guideline 4 directs assignment of VRFs based on the impact of a specific requirement to the reliability of the system. The team believes that Guideline 4 is reflective of the intent of VRFs in the first instance and therefore concentrated its approach on the reliability impact of the requirements.

- *FERC’s Guideline 2:* Consistency within a Reliability Standard. The requirement and its subrequirements in Requirement R1 have a single reliability objective, therefore only one VRF was assigned. Requirement R2 has no subrequirements and is assigned a single VRF.

- *FERC's Guideline 3: Consistency among Reliability Standards.* IRO-002-1, Requirement R2 includes actions similar to those required in IRO-010-1a, Requirements R1 and R2. The VRF for IRO-002-1, Requirement R1 is Medium, and this is inconsistent with the Lower VRF assigned to IRO-010-1a Requirements R1 and R2. The drafting team recognizes that the VRFs for IRO-010-1a Requirements R1 and R2 are lower than the VRF for the similar requirement in IRO-002-1 which is assigned a Medium VRF, however the IRO drafting team and stakeholders support the Lower VRFs based on NERC's criteria for VSLs. IRO-010-1a, Requirement R1 is an administrative requirement, not a real-time requirement, and if IRO-010-1a, Requirement R1 were violated, by itself, there would be no impact on the bulk electric system and there would be no impact to the ability of the Reliability Coordinator to monitor and control the bulk electric system. This meets NERC's criteria for a "Lower" VSL. IRO-010-1a, Requirement R1 works with other requirements in IRO-010-1a to provide the Reliability Coordinator with the data and information it needs to effectively monitor and control its portion of the bulk electric system.
- *FERC's Guideline 4: Consistency with NERC's Definition of a VRF.* IRO-010-1a Requirements R1 and R2 mandate that the Reliability Coordinator have and distribute a specification for data and information, and the requirements are primarily administrative. If a Reliability Coordinator fails to document its data and information needs, or fails to distribute the specification, the data specification, while a useful construct, is not the only way to identify what data is needed. The Reliability Coordinator has the authority to direct entities to provide whatever data and information it needs and the entities are required to provide that data and information. While the data specification provides a mechanism to provide the data, this is not the only mechanism the Reliability Coordinator has to obtain the data, and the failure to distribute the data specification does not mean that the needed data will not be provided to the Reliability Coordinator.
- *FERC's Guideline 5: Treatment of Requirements that Co-mingle More Than One Objective.* IRO-010-1a Requirements R1 and R2 each address a single objective and each has a single VRF.