A. Introduction

1. Title: Reliability Coordination — Responsibilities and Authorities

2. Number: IRO-001- $\frac{1}{2}$

- 3. Purpose: Reliability Coordinators must have the authority, plans, and agreements in place to immediately direct reliability entities within their Reliability Coordinator Areas to re-dispatch generation, reconfigure transmission, or reduce load to mitigate critical conditions to return the system to a reliable state. If a Reliability Coordinator delegates tasks to others, the Reliability Coordinator retains its responsibilities for complying with NERC and regional standards. Standards of conduct are necessary to ensure the Reliability Coordinator does not act in a manner that favors one market participant over another.
- **Reliability**Coordinator directives or notification within the Reliability Coordinator Areas.

4. Applicability

- **4.1.** Reliability Coordinators.
- 4.2. Regional Reliability Organizations.
- **4.2.** Transmission Operator.
- **4.3.** Balancing Authorities.
- **4.4.** Generator Operators.
- **4.5.** Transmission Service Providers.
- **4.6.** Load-Serving Entities.
- **4.7.** Distribution Providers.
- **4.8.** Purchasing-Selling Entities.
- **5.** (**Proposed**) **Effective Date:** January 1, 2007 To be determined.

B. Requirements

- 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.
- **R1.** The Reliability Coordinator shall comply with a regional reliability plan approved by the NERC Operating Committee.
- R3.—The Reliability Coordinator shall have clear decision—making authority to act and to or direct actions to be taken by Transmission Operators, Balancing Authorities, Generator Operators, Transmission Service Providers, Load-Serving Entities, Distribution Providers and Purchasing-Selling Entities within its Reliability

The RC SDT proposes retiring R1 as it is redundant with the ERO's existing Organization Registration and Certification Process. See section 503, item 2.2 of the NERC Rules of Procedure.

The RC SDT proposes retiring R2 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.

Draft 1: July 30, 2008

Coordinator Area to preserve the integrity and reliability prevent or mitigate the magnitude or duration of the Bulk Electric System. These actions shall be taken without delay, but no longer than 30 minutes.

Reliability Coordinatorsevents that result in Adverse
Reliability Impacts. [Violation Risk Factor: High]
[Time Horizon: Real-time Operations and Same Day
Operations]

The RC SDT proposes retiring R4 as it is redundant with NERC Rules of Procedure, Appendix 5, Section IV – Transitional Certification Procedures, item 16.

- R4. 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.

The RC SDT proposes retiring 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.

- R5. The Reliability Coordinator shall list within its reliability plan all entities to which the Reliability Coordinator has delegated required tasks.
- **R6.** The Reliability Coordinator shall verify that all delegated tasks are carried out by NERC-certified Reliability Coordinator operating personnel.

The RC SDT proposes retiring R6 as it is redundant with PER-003, R1.

R7. The Reliability Coordinator shall have clear, comprehensive coordination agreements with adjacent Reliability Coordinators to ensure that System Operating Limit or Interconnection Reliability

The RCSDT proposes retiring R7 as it is redundant with IRO-014, R1.

- Operating Limit violation mitigation requiring actions in adjacent Reliability Coordinator Areas are coordinated.
- **R2.** Transmission Operators, Balancing Authorities, Generator Operators, Transmission Service Providers, Load-Serving Entities, <u>Distribution Providers</u>, and Purchasing-Selling Entities shall act without intentional delay to comply with Reliability Coordinator directives unless such actions would violate safety, equipment, or regulatory or statutory requirements. <u>Under these circumstances</u>, the <u>[Violation Risk Factor: High] [Time Horizon: Real-time Operations and Same Day Operations]</u>
- R3. The Transmission Operator, Balancing Authority, Generator Operator, Transmission Service Provider, Load-Serving Entity, <u>Distribution Provider</u> or Purchasing-Selling Entity shall immediately confirm the ability to comply with the directive or inform the Reliability Coordinator upon recognition of the inability to perform the directive so that the Reliability Coordinator may implement alternate remedial actions. [Violation Risk Factor: High] [Time Horizon: Real-time Operations and Same Day Operations]

- R10. 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.
- R4. Each Reliability Coordinator that identifies an expected or actual threat with Adverse Reliability Impacts within its Reliability Coordinator Area shall notify, without intentional delay, all impacted Transmission Operators and Balancing Authorities in its Reliability Coordinator Area.

 [Violation Risk Factor: High] [Time Horizon: Red

[Violation Risk Factor: High] [Time Horizon: Real-time Operations, Same Day Operations and Operations Planning]

The RC SDT proposes retiring R10.

All Reliability Coordinator Standard Requirements are developed so that

the interest of reliability for the RC

Development Procedure states that

Reliability Standards. Equity issues

Area and the Interconnection.
Section 6 of the NERC Standard

NERC develops and maintains

are covered under the Reliability

Coordinator Standards of Conduct.

the Reliability Coordinator shall act in

R5. Each Reliability Coordinator who identifies an expected or actual threat with Adverse Reliability Impacts, within its Reliability Coordinator Area shall notify, without intentional delay, all impacted Transmission Operators and Balancing Authorities in its Reliability Coordinator Area when the transmission problem has been mitigated. [Violation Risk Factor: High] [Time Horizon: Real-time Operations, Same Day Operations and Operations Planning]

C. Measures

- M1. Each Regional Reliability Organization shall have, and provide upon request, evidence that could include, but is not limited to signed agreements or other equivalent evidence that will be used to confirm that it established 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 as described in Requirement 1.
- M2. Each Reliability Coordinator shall have and provide upon request evidence that could include, but is not limited to, job descriptions, signed agreements, an authority letter signed by an officer of the company, or other equivalent evidence that will be used to confirm that the Reliability Coordinator has the authority to act as described in Requirement 3.
- M3. The Reliability Coordinator shall have and provide upon request current formal operating agreements with entities that have been delegated any Reliability Coordinator tasks (Requirement 4 Part 1).
- M4. The Reliability Coordinator shall have and provide upon request evidence that could include, but is not limited to, job descriptions, signed agreements, records of training sessions, monitoring procedures or other equivalent evidence that will be used to confirm that all delegated tasks are understood, communicated, and addressed within its Reliability Coordinator Area (Requirement 4 Part 2 and Requirement 5).
- M5. The Reliability Coordinator shall have and provide upon request evidence that could include, but is not limited to, records that show each operating person assigned to perform a Reliability Coordinator delegated task has a NERC Reliability Coordinator certification credential, or equivalent evidence confirming that delegated tasks were

- carried out by NERC certified Reliability Coordinator operating personnel, as specified in Requirement 6.
- M6. The Reliability Coordinator shall have and provide upon request as evidence, signed agreements with adjacent Reliability Coordinators that will be used to confirm that it will coordinate corrective actions in the event SOL and IROL mitigation actions within neighboring areas must be taken. (Requirement 7)
- M1. Each Reliability Coordinator shall have evidence that it acted, or issued directives, to prevent or mitigate the magnitude or duration of Adverse Reliability Impacts within its Reliability Coordinator Area.
- M2. Each Transmission Operator, Balancing Authority, Generator Operator, Transmission Service Provider, Load-Serving Entity, or Purchasing-Selling Entity shall have evidence that it acted without delay to comply with the Reliability Coordinator's directives.
- M3. Each Transmission Operator, Balancing Authority, Generator Operator, Transmission Service Provider, Load-Serving Entity, or Purchasing-Selling Entity shall have and provide upon request evidence that could include, but is not limited toonfirmed its ability to, operator logs, voice recordings or transcripts of voice recordings, or other equivalent evidence that will be used to confirm that it did comply with the Reliability Coordinator's directives, or if for safety, equipment, regulatory or statutory requirements it could not comply, it informed the Reliability Coordinator immediately. (Requirement 8)upon recognition of the inability to comply.
- M4. Each Reliability Coordinator shall have evidence that it notified, without intentional delay, all impacted Transmission Operators and balancing Authorities in its Reliability Coordinator Area when it identified a real or potential threat with Adverse Reliability Impacts, within its Reliability Coordinator Area.
- M5. Each Reliability Coordinator shall have evidence that it notified, without intentional delay, all impacted Transmission Operators and balancing Authorities in its Reliability Coordinator Area when the real or potential threat with Adverse Reliability Impacts within its Reliability Coordinator Area has been mitigated.

D. Compliance

- 1. Compliance Monitoring Process
 - 1.1. Compliance Monitoring Responsibility
 - **1.1.** Compliance Enforcement Authority

NERC shall be responsible for compliance monitoring of the Regional Reliability OrganizationEntity.

Regional Reliability Organizations Entities shall be responsible for compliance monitoring of the Reliability Coordinators, Transmission Operators, Generator Operators, Distribution Providers, and Load Serving Entities.

1.2. Compliance Monitoring Period and Reset Time Frame

Not applicable.

One or more of the following methods will be used to assess compliance:

- -Self-certification (Conducted annually with submission according to schedule.)
- -Spot Check Audits (Conducted anytime with up to 30 days notice given to prepare.)
- -Periodic Audit (Conducted once every three years according to schedule.)
- —Triggered Investigations (Notification of an investigation must be made within 60 days of an event or complaint of noncompliance. The entity will have up to 30 days to prepare for the investigation. An entity may request an extension of the preparation period and the extension will be considered by the Compliance Monitor on a case-by-case basis.)

The Performance-Reset Period shall be 12 months from the last finding of non-compliance.

1.3. Compliance Monitoring and Enforcement Processes:

Compliance Audits

Self-Certifications

Spot Checking

Compliance Violation Investigations

Self-Reporting

Complaints

1.4. Data Retention

Each Regional Reliability Organization shall have its current, in-force document for Measure 1.

Each Reliability Coordinator shall have its current, in force documents or the latest copy of a record as evidence of compliance to Measures 2 through 6.

Each Transmission Operator, Generator Operator, Distribution Provider, and Load Serving Entity shall keep 90 days of historical data (evidence) for Measure 7.

Each applicable entity shall retain data and evidence for a rolling 12 months unless directed by its Compliance Enforcement Authority to retain specific evidence for a longer period of time as part of an investigation.

If an entity is found non-compliant the entity shall keep information related to the noncompliance until found compliant or for two years plus the current year, whichever is longer.

Evidence used as part of a triggered investigation shall be retained by the entity being investigated for one year from the date that the investigation is closed, as determined by the Compliance Monitor;

The Compliance <u>Monitor-Enforcement Authority</u> shall keep the last <u>periodic</u> audit <u>report records</u> and all requested and submitted subsequent compliance records.

5

1.5. Additional Compliance Information

None.

Draft 1: July 30, 2008

2. Levels of Non-Compliance: for a Violation Severity Levels

Requirement	Lower VSL	Moderate VSL	High VSL	Severe VSL
<u>R1</u>	<u>N/A</u>	<u>N/A</u>	The Reliability Coordinator failed to act to prevent or mitigate the magnitude or duration of Adverse Reliability Impacts.	The Reliability Coordinator failed to act and direct actions to prevent or mitigate the magnitude or duration of Adverse Reliability Impacts
<u>R2</u>	<u>N/A</u>	The responsible entity followed the Reliability Coordinators directive with a delay not caused by equipment problems.	The responsible entity followed the majority of the Reliability Coordinators directive but did not fully follow the directive because it would violate safety, equipment, statutory or regulatory requirements.	The responsible entity did not follow the Reliability Coordinators directive.
<u>R3</u>	The responsible entity failed to immediately confirm the ability to comply with the directive issued by the Reliability Coordinator.	<u>N/A</u>	<u>N/A</u>	The responsible entity failed to inform the Reliability Coordinator upon recognition of the inability to perform the directive.
<u>R4</u>	<u>N/A</u>	<u>N/A</u>	<u>N/A</u>	The Reliability Coordinator who identified an expected or actual threat with Adverse Reliability Impacts within its Reliability Coordinator Area failed to issue an alert to all impacted Transmission Operators and Balancing Authorities in its Reliability Coordinator Area.
<u>R5</u>	<u>N/A</u>	N/A	N/A	The Reliability Coordinator failed to notify all impacted Transmission Operators, Balancing Authorities, when the transmission problem had been mitigated.

E. Regional Reliability Organization: Variances

- 2.1. Level 1: Not applicable
- 2.2. Level 2: Not applicable
- 2.3. Level 3: Not applicable
- 2.4. Level 4: Does not have evidence it established 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 as described in Requirement 1.
- 3. Levels of Non-Compliance for a Reliability Coordinator:
 - 3.1. Level 1: Not applicable.
 - 3.2. Level 2: Not applicable.
 - 3.3. Level 3: Not applicable.
 - 3.4. Level 4: There shall be a separate Level 4 non-compliance for every one of the following requirements that is in violation:
 - **3.4.1** Does not have the authority to act as described in R3.
 - 3.4.2 Does not have formal operating agreements with entities that have been delegated any Reliability Coordinator tasks, as specified in R4, Part 1.
 - 3.4.3 Did not confirm that all delegated tasks are understood, communicated, and addressed within its Reliability Coordinator Area and that they are being performed in a manner that complies with NERC and regional standards for the delegated tasks as per R4, Part 2.
 - 3.4.4 Did not verify that delegated tasks are being carried out by NERC Reliability Coordinator certified staff as specified in R6
 - 3.4.5 Does not have agreements with adjacent Reliability Coordinators that confirm that they will coordinate corrective actions in the event SOL and IROL mitigation actions must be taken (R7).
- 4. Levels of Non-Compliance for a Transmission Operator, Balancing Authority, Generator Operator, Transmission Service Provider, Load-Serving Entity, or Purchasing-Selling Entity:
 - 4.1. Level 1: Not applicable.
 - 4.2. Level 2: Not applicable.
 - 4.3. Level 3: Not applicable.
 - **4.4.** Level 4: There shall be a separate Level 4 non-compliance for every one of the following requirements that is in violation:
 - **4.4.1** Did not comply with a Reliability Coordinator directive for reasons other than safety, equipment, or regulatory or statutory requirements. (R8)

Adopted by Board of Trustees: November 1, 2006

4.4.2 Did not inform the Reliability Coordinator immediately after it was determined that it could not follow a Reliability Coordinator directive. (R8)

F. Regional Differences

None identified.

Version History

Version	Date	Action	Change Tracking
0	April 1, 2005	Effective Date	New
0	August 8, 2005	Removed "Proposed" from Effective Date	Errata
1	November 1, 2006	Adopted by Board of Trustees	Revised
<u>1</u>	April 4, 2007	Approved by FERC — Effective Date	New
2	TBD	Revised per SAR for project 2006-6, reliability Coordination; added VRFs and VSLs as approved from VRF and VSL projects	Revised

Adopted by Board of Trustees: November 1, 2006