### **Prerequisite Approvals**

- IRO-001-2 Reliability Coordination Responsibilities and Authorities
- IRO-008-1 Reliability Coordinator Operational Analyses and Real-time Assessments
- IRO-009-1 Reliability Coordinator Actions to Operate Within Interconnection Reliability Operating Limits
- IRO-010-1 Reliability Coordinator Data Specification and Collection

### **Conforming Changes to Requirements in Already Approved Standards**

■ IRO-001-2 with respect to R6 and R15

### **Revision Summary**

• Many of the requirements in this standard will be retired under the IROL SDT work plan. The RC SDT proposes retiring other requirements and moving R6 and R15 to IRO-001-2. This will retire or move all requirements in this standard. The RC SDT proposes retiring the standard.

### **Functions that Must Comply with the Requirements in the Standards**

Not applicable – all requirements are recommended for retirement or movement to other standards.

### **Effective Dates**

To be determined.

## **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)
IRO-005-2  R1. Each Reliability Coordinator shall monitor its Reliability Coordinator Area parameters, including but not limited to the following: [Violation Risk Factor: High]  (and all R1 sub-requirements)	Retire R1 and its subrequirements – Monitoring capability can be objectively measured and is essential to real-time operations – however real-time monitoring is a supporting activity and is only one of several processes used to support operation within defined parameters. Monitoring capability should be assessed during certification and not as a requirement.
Notes: The RC SDT recommends retiring IRO-005-2 Requirement R1 and its subrequirements.	

Already Approved Standard	Proposed Replacement Requirement(s)
IRO-005-2  R2. Each Reliability Coordinator shall be aware of all Interchange Transactions that wheel through, source, or sink in its Reliability Coordinator Area, and make that Interchange Transaction information available to all Reliability Coordinators in the Interconnection. [Violation Risk Factor: High]	None – Requirement should be retired as it is redundant with:  INT-005-1  R1. Prior to the expiration of the time period defined in the Timing Table, Column A, the Interchange Authority shall distribute the Arranged Interchange information for reliability assessment to all
	reliability entities involved in the interchange.  R1.1. When a Balancing Authority or Reliability Coordinator initiates a Curtailment to Confirmed or Implemented Interchange for reliability, the Interchange Authority shall distribute the Arranged Interchange information for reliability assessment only to the Source Balancing Authority and the Sink Balancing Authority.

- The requirement is not measurable (shall be aware) and should be retired because it is redundant with INT-005-1, R1.
- The IA is responsible for making interchange information available to all reliability entities including the Reliability Coordinator.
- When IRO-010-1 becomes effective, IRO-005-2 R2 should be retired. The e-tag system replaced the need for this requirement. In addition, if the Reliability Coordinator needs this information, the Reliability Coordinator can add this item to the list of data and information on its data specification under IRO-010 R1

Already Approved Standard	Proposed Replacement Requirement(s)
R3. As portions of the transmission system approach or exceed SOLs or IROLs, the Reliability Coordinator shall work with its Transmission Operators and Balancing Authorities to evaluate and assess any additional Interchange Schedules that would violate those limits. If a potential or actual IROL violation cannot be avoided through proactive intervention, the Reliability Coordinator shall initiate control actions or emergency procedures to relieve the violation without delay, and no longer than 30 minutes. The Reliability Coordinator shall ensure all resources, including load shedding, are available to address a potential or actual IROL violation. [Violation Risk Factor: High]	None – This requirement is to be retired per the IROL team's implementation plan.

■ The IROL Implementation Plan proposes retiring IRO-005-2 R3 when IRO-009-1 becomes effective. IRO-005 R3 can lead the Reliability Coordinator to believe it has up to 30 minutes to relieve an IROL violation – but some IROLs have a T<sub>v</sub> that is much shorter than 30 minutes.

Proposed Replacement Requirement(s)
None – The RC SDT proposes that this requirement be retired. The BA has its own requirements regarding compliance with CPS and DCS standards as well as requesting emergency assistance. We view these as vestiges of an earlier program that no longer apply given the current mandatory requirements with which the BA must comply. This requirement should be retired.  The requirement is also redundant with existing EOP-002-2.

#### Notes: EOP-002-2

- **R1.** Each Balancing Authority and Reliability Coordinator shall have the responsibility and clear decision-making authority to take whatever actions are needed to ensure the reliability of its respective area and shall exercise specific authority to alleviate capacity and energy emergencies.
- **R2.** Each Balancing Authority shall implement its capacity and energy emergency plan, when required and as appropriate, to reduce risks to the interconnected system.
- **R3.** A Balancing Authority that is experiencing an operating capacity or energy emergency shall communicate its current and future system conditions to its Reliability Coordinator and neighboring Balancing Authorities.
- **R4.** A Balancing Authority anticipating an operating capacity or energy emergency shall perform all actions necessary including bringing on all available generation, postponing equipment maintenance, scheduling interchange purchases in advance, and being prepared to reduce firm load.
- **R5.** A deficient Balancing Authority shall only use the assistance provided by the Interconnection's frequency bias for the time needed to implement corrective actions. The Balancing Authority shall not unilaterally adjust generation in an attempt to return

Interconnection frequency to normal beyond that supplied through frequency bias action and Interchange Schedule changes. Such unilateral adjustment may overload transmission facilities.

- **R6.** If the Balancing Authority cannot comply with the Control Performance and Disturbance Control Standards, then it shall immediately implement remedies to do so. These remedies include, but are not limited to:
  - **R6.1.** Loading all available generating capacity. **R6.2.** Deplo
    - **R6.2.** Deploying all available operating reserve.
  - **R6.3.** Interrupting interruptible load and exports.
- **R6.4.** Requesting emergency assistance from other Balancing Authorities.
- R6.5. Declaring an Energy Emergency through its Reliability Coordinator; and
- **R6.6.** Reducing load, through procedures such as public appeals, voltage reductions, curtailing interruptible loads and firm loads.
- **R7.** Once the Balancing Authority has exhausted the steps listed in Requirement 6, or if these steps cannot be completed in sufficient time to resolve the emergency condition, the Balancing Authority shall:
  - R7.1. Manually shed firm load without delay to return its ACE to zero; and
  - **R7.2.** Request the Reliability Coordinator to declare an Energy Emergency Alert in accordance with Attachment 1-EOP-002-0 "Energy Emergency Alert Levels."
- **R8.** A Reliability Coordinator that has any Balancing Authority within its Reliability Coordinator area experiencing a potential or actual Energy Emergency shall initiate an Energy Emergency Alert as detailed in Attachment 1-EOP-002-0 "Energy Emergency

Alert Levels." The Reliability Coordinator shall act to mitigate the emergency condition, including a request for emergency assistance if required.

- **R9.** When a Transmission Service Provider expects to elevate the transmission service priority of an Interchange Transaction from Priority 6 (Network Integration Transmission Service from Non-designated Resources) to Priority 7 (Network Integration Transmission Service from designated Network Resources) as permitted in its transmission tariff (See Attachment 1-IRO-006-0 "Transmission Loading Relief Procedure" for explanation of Transmission Service Priorities):
  - **R9.1.** The deficient Load-Serving Entity shall request its Reliability Coordinator to initiate an Energy Emergency Alert in accordance with Attachment 1-EOP-002-0.
  - **R9.2.** The Reliability Coordinator shall submit the report to NERC for posting on the NERC Website, noting the expected total MW that may have its transmission service priority changed.
  - **R9.3.** The Reliability Coordinator shall use EEA 1 to forecast the change of the priority of transmission service of an Interchange Transaction on the system from Priority 6 to Priority 7.
  - **R9.4.** The Reliability Coordinator shall use EEA 2 to announce the change of the priority of transmission service of an Interchange Transaction on the system from Priority 6 to Priority 7.

Already Approved Standard	Proposed Replacement Requirement(s)
R5. Each Reliability Coordinator shall identify the cause of any potential or actual SOL or IROL violations. The Reliability Coordinator shall initiate the control action or emergency procedure to relieve the potential or actual IROL violation without delay, and no longer than 30 minutes. The Reliability Coordinator shall be able to utilize all resources, including load shedding, to address an IROL violation. [Violation Risk Factor: High]	None – This requirement is to be retired per the IROL team's implementation plan.

■ The IROL Implementation Plan proposes retiring IRO-005-2 R5 when IRO-009-1 becomes effective. IRO-005 R5 can lead the Compliance Enforcement Authority to believe that the Reliability Coordinator has information to see all SOLs, and this is not always true. Every facility in the Transmission Operator's area has a System Operating Limit, but the Reliability Coordinator isn't required to see all these limits and may not have information to determine the cause of instances of exceeding these limits.

Already Approved Standard	Proposed Replacement Requirement(s)
IRO-005-2  R6. Each Reliability Coordinator shall ensure its Transmission Operators and Balancing Authorities are aware of Geo-Magnetic Disturbance (GMD) forecast information and assist as needed in the development of any required response plans.	The RC SDT proposes retiring this requirement as it is redundant with proposed IRO-001-2, R11. A GMD is one of the "expected or actual threats with Adverse Reliability Impacts".
	IRO-002-2 (proposed)
	R1. 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. [Violation Risk Factor: High] [Time Horizon: Real-time Operations, Same Day Operations and Operations Planning]

Notes: The RC SDT proposes retiring IRO-005-2 Requirement R6 as it is redundant with the proposed IRO-002-2 R1.

Already Approved Standard	Proposed Replacement Requirement(s)
IRO-005-2	None
R7. The Reliability Coordinator shall disseminate information within its Reliability Coordinator Area, as required.	

• The RC SDT proposes that IRO-005-2 Requirement R7 is too vague and ambiguous to measure. We recommend retiring this requirement. This is a supporting activity associated with other higher-level performance requirements such as the requirement in IRO-008 for the RC to share the results of its analyses under specified conditions.

Already Approved Standard	Proposed Replacement Requirement(s)
IRO-005-2	IRO-005-2
R8. Each Reliability Coordinator shall monitor system	The RCSDT recommends retiring this requirement as it is redundant with:
frequency and its Balancing Authorities' performance and direct any necessary rebalancing to return to CPS and DCS compliance. The Transmission Operators and	TOP-006-1, R7 Each Reliability Coordinator, Transmission Operator and Balancing Authority shall monitor system frequency.
Balancing Authorities shall utilize all resources, including	EOP-002-2
firm load shedding, as directed by its Reliability Coordinator to relieve the emergent condition.	<b>R4.</b> A Balancing Authority anticipating an operating capacity or energy emergency shall perform all actions necessary including bringing on all available generation, postponing equipment maintenance, scheduling interchange purchases in advance, and being prepared to reduce firm load.
	R6. If the Balancing Authority cannot comply with the Control Performance and Disturbance Control Standards, then it shall immediately implement remedies to do so. These remedies include, but are not limited to:  R6.1. Loading all available generating capacity.
	R6.2. Deploying all available operating reserve.
	R6.3. Interrupting interruptible load and exports.
	<b>R6.4.</b> Requesting emergency assistance from other Balancing Authorities.
	R6.5. Declaring an Energy Emergency through its Reliability Coordinator; and
	<b>R6.6.</b> Reducing load, through procedures such as public appeals, voltage reductions, curtailing interruptible loads and firm loads.
	<b>R7.</b> Once the Balancing Authority has exhausted the steps listed in Requirement 6, or if these steps cannot be completed in sufficient time to resolve the emergency condition, the Balancing Authority shall:
	R7.1. Manually shed firm load without delay to return its ACE to zero; and
	R7.2. Request the Reliability Coordinator to declare an Energy Emergency Alert in accordance with Attachment 1-EOP-002-0 "Energy Emergency Alert Levels."
Notes: The PC SDT recommends ratiring IPO-005-2 P8	The BA has its own requirements regarding compliance with CPS and DCS

**Notes:** The RC SDT recommends retiring IRO-005-2 R8. The BA has its own requirements regarding compliance with CPS and DCS standards as well as requesting emergency assistance. RCSDT views these as vestiges of an earlier program that no longer apply given the current mandatory requirements with which the BA must comply. The second sentence is redundant with EOP-002, R4, R6, R7, and R9. This requirement should be retired.

Already Approved Standard	Proposed Replacement Requirement(s)
R9. The Reliability Coordinator shall coordinate with Transmission Operators, Balancing Authorities, and Generator Operators as needed to develop and implement action plans to mitigate potential or actual SOL, IROL, CPS or DCS violations. The Reliability Coordinator shall coordinate pending generation and transmission maintenance outages with Transmission Operators, Balancing Authorities, and Generator Operators as needed in both the real time and next-day reliability analysis timeframes.	The RCSDT proposes to retire this requirement from IRO-005.  The RCSDT proposes retiring this requirement as it is redundant with TOP-003 and IRO-004 (all requirements) for next day requirements. The RC has the authority to coordinate pending outages in real-time through IRO-001-2, R1 (proposed). The issue of CPS and DCS is covered in EOP-002-2, R6, R7 and R8 (see above).

Notes: TOP-003-0

- **R1.** Generator Operators and Transmission Operators shall provide planned outage information.
- **R1.1.** Each Generator Operator shall provide outage information daily to its Transmission Operator for scheduled generator outages planned for the next day (any foreseen outage of a generator greater than 50 MW). The Transmission Operator shall establish the outage reporting requirements.
- **R1.2.** Each Transmission Operator shall provide outage information daily to its Reliability Coordinator, and to affected Balancing Authorities and Transmission Operators for scheduled generator and bulk transmission outages planned for the next day (any foreseen outage of a transmission line or transformer greater than 100 kV or generator greater than 50 MW) that may collectively cause or contribute to an SOL or IROL violation or a regional operating area limitation. The Reliability Coordinator shall establish the outage reporting requirements.
- **R1.3.** Such information shall be available by 1200 Central Standard Time for the Eastern Interconnection and 1200 Pacific Standard Time for the Western Interconnection.
- **R2.** Each Transmission Operator, Balancing Authority, and Generator Operator shall plan and coordinate scheduled outages of system voltage regulating equipment, such as automatic voltage regulators on generators, supplementary excitation control, synchronous condensers, shunt and series capacitors, reactors, etc., among affected Balancing Authorities and Transmission Operators as required.
- **R3.** Each Transmission Operator, Balancing Authority, and Generator Operator shall plan and coordinate scheduled outages of telemetering and control equipment and associated communication channels between the affected areas.
- R4. Each Reliability Coordinator shall resolve any scheduling of potential reliability conflicts.

#### IRO-004-1

- **R1.** Each Reliability Coordinator shall conduct next-day reliability analyses for its Reliability Coordinator Area to ensure that the Bulk Electric System can be operated reliably in anticipated normal and Contingency event conditions. The Reliability Coordinator shall conduct Contingency analysis studies to identify potential interface and other SOL and IROL violations, including overloaded transmission lines and transformers, voltage and stability limits, etc.
- **R2.** Each Reliability Coordinator shall pay particular attention to parallel flows to ensure one Reliability Coordinator Area does not place an unacceptable or undue Burden on an adjacent Reliability Coordinator Area.
- **R3.** Each Reliability Coordinator shall, in conjunction with its Transmission Operators and Balancing Authorities, develop action plans that may be required, including reconfiguration of the transmission system, re-dispatching of generation, reduction or curtailment of Interchange Transactions, or reducing load to return transmission loading to within acceptable SOLs or IROLs.
- **R4.** Each Transmission Operator, Balancing Authority, Transmission Owner, Generator Owner, Generator Operator, and Load-Serving Entity in the Reliability Coordinator 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.
- **R5.** Each Reliability Coordinator shall share the results of its system studies, when conditions warrant or upon request, with other Reliability Coordinators and with Transmission Operators, Balancing Authorities, and Transmission Service Providers within its Reliability Coordinator Area. The Reliability Coordinator shall make study results available no later than 1500 Central Standard Time for the Eastern Interconnection and 1500 Pacific Standard Time for the Western Interconnection, unless circumstances warrant otherwise.
- **R6.** If the results of these studies indicate potential SOL or IROL violations, the Reliability Coordinator shall direct its Transmission Operators, Balancing Authorities and Transmission Service Providers to take any necessary action the Reliability Coordinator deems appropriate to address the potential SOL or IROL violation.
- **R7.** Each Transmission Operator, Balancing Authority, and Transmission Service Provider shall comply with the directives of its Reliability Coordinator based on the next day assessments in the same manner in which it would comply during real time operating events.

### IRO-001-2, R1 (proposed)

R1. The Reliability Coordinator shall act 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 Coordinator Area to prevent or mitigate the magnitude or duration of events that result in Adverse Reliability Impacts. [Violation Risk Factor: High][Time Horizon: Real-time Operations and Same Day Operations]

Already Approved Standard	Proposed Replacement Requirement(s)
IRO-005-2	
R10. As necessary, the Reliability Coordinator shall assist the Balancing Authorities in its Reliability Coordinator Area in arranging for assistance from neighboring Reliability Coordinator Areas or Balancing Authorities. [Violation Risk Factor: High]	None EOP-002-2
	R7.2. Request the Reliability Coordinator to declare an Energy Emergency Alert in accordance with Attachment 1-EOP-002-0 "Energy Emergency Alert Levels."
	<b>R8.</b> A Reliability Coordinator that has any Balancing Authority within its Reliability Coordinator area experiencing a potential or actual Energy Emergency shall initiate an Energy Emergency Alert as detailed in Attachment 1-EOP-002-0 "Energy Emergency Alert Levels." The Reliability Coordinator shall act to mitigate the emergency condition, including a request for emergency assistance if required.
Notes: The RCSDT proposes to retire this requirement as it is redundant with EC	DP-002-2

Already Approved Standard	Proposed Replacement Requirement(s)
IRO-005-2	
R11. The Reliability Coordinator shall identify sources of large Area Control	None
Errors that may be contributing to Frequency Error, Time Error, or Inadvertent Interchange and shall discuss corrective actions with the appropriate Balancing	IRO-001-2 (proposed)
Interchange and shall discuss corrective actions with the appropriate Balancing Authority. The Reliability Coordinator shall direct its Balancing Authority to comply with CPS and DCS.	R1. Reliability Coordinator shall act 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 Coordinator Area to prevent or mitigate the magnitude or duration of Adverse Reliability Impacts. [Violation Risk Factor: High][Time Horizon: Real-time Operations and Same Day Operations]
	R7. Each Reliability Coordinator, Transmission Operator, and Balancing Authority shall monitor system frequency.
Notes: The RCSDT proposes retiring IRO-005-2 as it is redundant with the prop	osed IRO-001-2 R1 and approved TOP-006-1 R7.

SPSs are a part of that.

#### **Already Approved Standard Proposed Replacement Requirement(s)** None - The RCSDT recommends retiring this requirement as it is redundant with IRO-005-2 proposed IRO-010: R12. Whenever a Special Protection System that may have an inter-Balancing Authority, or inter-Transmission R1. The Reliability Coordinator shall have a documented data specification for data Operator impact (e.g., could potentially affect and information to build and maintain models to support Real-Time monitoring, Operational Planning Analyses, and Real-time Assessments. The specification shall transmission flows resulting in a SOL or IROL violation) is armed, the Reliability Coordinators shall be aware of the include the following: (Violation Risk Factor: Low) (Time Horizon: Operations impact of the operation of that Special Protection System Plannina) on inter-area flows. The Transmission Operator shall **R1.1.** List of required data and information. immediately inform the Reliability Coordinator of the R1.2. Mutually agreeable format. status of the Special R1.3. Timeframe and periodicity for providing data and information (based Protection System including any degradation or potential on its hardware and software requirements, and the time needed to do its failure to operate as expected. Operational Planning Analyses). R1.4. Process for data provision when automated Real-Time system operating data is unavailable. R2. 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. (Violation Risk Factor: Low) (Time Horizon: Operations Planning) R3. Each Balancing Authority, Generator Owner, Generator Operator, Interchange Authority, Load-serving Entity, Reliability Coordinator, Transmission Operator, and Transmission Owner shall provide data and information, as specified, to the Reliability Coordinator(s) with which it has a reliability relationship. The data and information is limited to data needed by the Reliability Coordinator to support Real-Time Monitoring, Operational Planning Analyses, and Real-Time Assessments. (Violation Risk Factor: Medium) (Time Horizon: Operations Planning; Same-day Operations; Real-time Operations) Notes: The RC SDT recommends retiring this requirement as it is redundant with proposed IRO-010, R1 and R3. Also, the scope of project

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2007-3 includes enhancing the SPS provisions of TOP-005. IRO-003, R1 indicates the RC will monitor all items that will impact reliability, and

Already Approved Standard	Proposed Replacement Requirement(s)
R13. Each Reliability Coordinator shall ensure that all Transmission Operators, Balancing Authorities, Generator Operators, Transmission Service Providers, Load-Serving Entities, and Purchasing-Selling Entities operate to prevent the likelihood that a disturbance, action, or non-action in its Reliability Coordinator Area will result in a SOL or IROL violation in another area of the Interconnection. In instances where there is a difference in derived limits, the Reliability Coordinator and its Transmission Operators, Balancing Authorities, Generator Operators, Transmission Service Providers, Load-Serving Entities, and Purchasing-Selling Entities shall always operate the Bulk Electric System to the most limiting parameter.	None

**Notes:** The IROL SDT has proposed retiring the first sentence of this requirement as it is redundant with the proposed IRO-009-1. The RC SDT recommends retiring the remaining portion of this requirement as it is a facet of the SOL / IROL methodology required in FAC-010-1, FAC-011-1 and FAC-014-1.

Already Approved Standard	Proposed Replacement Requirement(s)
IRO-005-2	None
R14. Each Reliability Coordinator shall make known to Transmission Service Providers within its Reliability Coordinator Area, SOLs or IROLs within its widearea view. The Transmission Service Providers shall respect these SOLs or IROLs in accordance with filed tariffs and regional Total Transfer Calculation and Available Transfer Calculation processes.	

Notes: Per the IROL SDT implementation plan, the first sentence of this requirement should be retired upon the implementation of IRO-009-1.

The RC SDT proposes retiring the second sentence of this requirement. The concept of this requirement is more appropriately addressed in the proposed MOD standards under project 2006-7. As written, this requirement is not measureable and unenforceable as a TSP's tariff may supersede the requirement.

Already Approved Standard	Proposed Replacement Requirement(s)
R15. Each Reliability Coordinator who foresees a transmission problem (such as an SOL or IROL violation, loss of reactive reserves, etc.) within its Reliability Coordinator Area shall issue an alert to all impacted Transmission Operators and Balancing Authorities in its Reliability Coordinator Area without delay. The receiving Reliability Coordinator shall disseminate this information to its impacted Transmission Operators and Balancing Authorities. The Reliability Coordinator shall notify all impacted Transmission Operators, Balancing Authorities, when the transmission problem has been mitigated.	None
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**Notes:** The RC SDT moved this requirement to IRO-001-2.

	Already Approved Standard	Proposed Replacement Requirement(s)
IRO-005-2		IRO-005-2
R16.	Each Reliability Coordinator shall confirm reliability assessment results and determine the effects within its own and adjacent Reliability Coordinator Areas. The Reliability Coordinator shall discuss options to mitigate potential or actual SOL or IROL violations and take actions as necessary to always act in the best interests of the Interconnection at all times. [Violation Risk Factor: High]	None – The IROL SDT's Implementation plan proposes retirement of R16 and R17.
R17.	When an IROL or SOL is exceeded, the Reliability Coordinator shall evaluate the local and wide-area impacts, both real-time and post-contingency, and determine if the actions being taken are appropriate and sufficient to return the system to within IROL in thirty minutes. If the actions being taken are not appropriate or sufficient, the Reliability Coordinator shall direct the Transmission Operator, Balancing Authority, Generator Operator, or Load-Serving Entity to return the system to within IROL or SOL. [Violation Risk Factor: High]	

**Notes:** IRO-005 R16 is a mix of requirements and the Missing Measures and Compliance Elements drafting team determined that, as written, R16 is too vague to be measured. The intent of this requirement is duplicated more clearly in IRO-008 and IRO-009.

■ IRO-005 R17 can lead the Reliability Coordinator to believe it has up to 30 minutes to relieve an IROL violation – but some IROLs have a T<sub>v</sub> that is much shorter than 30 minutes. Note that the RC does not see all SOLs.