

Consideration of Issues, Directives and Recommendations

Project 2012-09 IRO Five-year Review Team

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Issue or Directive	Source	Consideration of Issue or Directive
<p>914. Further, pursuant to section 215(d)(5) of the FPA and § 39.5(f) of our regulations, we adopt in the Final Rule the proposal to direct that the ERO develop a modification to the Reliability Standard through the Reliability Standards development process to create criteria to define the term “critical facilities” in a reliability coordinator’s area and its adjacent systems. In developing the required modification, the ERO should consider the suggestions of APPA, Entergy and Xcel.</p>	<p>FERC Order 693, Paragraph 914</p>	<p>Requirement R2 is a compound requirement with two distinct reliability objectives. The first reliability objective is to “...know the current status of all critical facilities whose failure, degradation or disconnection could result in an SOL or IROL violation .” With the above proposed revision to R1, it is clear that the RC must “know” the status of all facilities that may result in an SOL or IROL and, thus, obviates the need for this part of R2.</p> <p>The second part of R2 is that the RC shall know the status of facilities that may be required to assist in restoration objectives. The team has retained this part of the requirement and revised it using the defined term “Facilities,” as follows: R2. Each Reliability Coordinator shall know and assess the status of Facilities that may be required to assist area restoration objectives. [Violation Risk Factor: High; Time horizon: Real-time Operations, Operations Planning]</p>

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		<p>Requirement R2 is the subject of a FERC Order 693 directive to “develop criteria to define the term “critical facilities” in a reliability coordinator’s area and its adjacent systems.” The team proposes revisions to Requirement R1 and R2 to streamline the language to have the RC determine SOL and IROL exceedances. This will require the RC to be able to determine SOL and IROL issues prior to a violation of either one, which improves reliability. By revising R1, the team believes that the first sentence of R2 is no longer necessary and, thus, obviates the need to define “critical facilities.”</p>
<p>IRO-001-3, Requirement R1: There are 3 concepts here and suggest the following:</p> <ol style="list-style-type: none"> 1 RC has the authority to direct others to act. 2 RC has the obligation to direct others to act to prevent identified events or mitigate the magnitude or duration of actual events that result in an Emergency or Adverse Reliability Impact. 3 When directing others to act in accordance with this requirement, a RC must identify its directive as a "Reliability Directive". 	<p>Industry Expert Review Panel Recommendations</p>	<p>The IRO FYRT concurs with each point that is recommended. The IRO FYRT points out that the first two items are addressed explicitly or implicitly in Requirement R1. The third item is addressed in COM-002-3, Requirement R1. The IRO FYRT does not recommend combining these standards.</p>

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<p>IRO-001-3, Entire Standard: Consider consolidating with other authority-related standards</p>	<p>Industry Expert Review Panel Recommendations</p>	<p>The IRO FYRT suggests waiting until the new standard construct is initiated before implementing this recommendation.</p>
<p>IRO-001-3, Requirement R3: Doesn't require a reason to Not comply with the direction.</p>	<p>Industry Expert Review Panel Recommendations</p>	<p>The IRO FYRT believes that the reason to not comply is specified in Requirement R2, which is directly mentioned in Requirement R3 and therefore no revision is necessary.</p>
<p>IRO-003-2, Requirement R1: Need to clarify “facilities” and the phrase "which may include sub-transmission" is not clear</p>	<p>Industry Expert Review Panel Recommendations</p>	<p>The IRO FYRT has proposed revisions to this requirement that addresses these recommendations. The term “facilities” was revised to “Facilities” and the phrase which may include sub-transmission” was deleted.</p>
<p>IRO-003-2, Requirement R1: 1. The first sentence is redundant with R1. 2. The second sentence should be moved to EOP-</p>	<p>Industry Expert Review Panel Recommendations</p>	<p>IRO FYRT Responses: 1. The IRO FYRT agrees and has proposed retiring the first sentence.</p>

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<p>006. 3. What does "know" mean? 4. What critical facilities are meant; is it "Facilities"?</p>		<p>2. The IRO FYRT notes that EOP-006 deals with system restoration plans while IRO-003 deals with real-time status of Facilities. 3. The IRO FYRT shared the concerns regarding "know". The team believes that this relates to real-time or near real-time updates of information. The team has proposed revising the phrase to "know and assess". 4. The IRO FYRT has proposed revising "facilities" to "Facilities"</p>
<p>IRO-004-2, Requirement R1: Retire the requirement as the intent is covered in IRO-008 R1 and is also duplicative of other IRO standards (IRO-001-1.1 R3)</p>	<p>Industry Expert Review Panel Recommendations</p>	<p>The IRO FYRT concurs with this recommendation and has proposed retiring Requirement R1 as it is redundant with IRO-001-3, Requirements R2 and R3 with the exception of the Transmission Service Provider. The IRO FYRT has proposed adding the Transmission Service Provider (TSP) to IRO-001-3, Requirements R2 and R3.</p>
<p>IRO-005-4, Requirements R1: Consolidate with IRO-008 R3</p>	<p>Industry Expert Review Panel Recommendations</p>	<p>The IRO FYRT concurs with this recommendation and proposed the suggested revision.</p>

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IRO-005-4, Requirements R2: Consolidate with IRO-008 and create R4	Industry Expert Review Panel Recommendations	The IRO FYRT concurs with this recommendation and proposed the suggested revision.
IRO-006-5, Requirement R1: Considering consolidating with authority std	Industry Expert Review Panel Recommendations	The IRO FYRT suggests waiting until the new standard construct in initiated before implementing this recommendation.
IRO-006-EAST-1: Possible to combine in continent wide standard?	Industry Expert Review Panel Recommendations	The IRO FYRT believes that this should remain as a separate standard for the Eastern Interconnection at this time. The team suggests revisiting this recommendation when the other IRO-006 (TRE and WECC) are to be reviewed.
IRO-008-1, Requirement R1: 1. Need to add SOLs. Incorporate "grid impactful SOLs" into its methodology. These are SOLs that can become IROLs. Add a definition to the	Industry Expert Review Panel Recommendations	IRO FYRT Responses: 1. The IRO FYRT acknowledges that there is a concern regarding "grid impactful SOLs" however the FYRT believes that this issue should be addressed in a separate standards initiative lest the work of the

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<p>Glossary. Grid impactful SOLs is defined in footnote 31 of paragraph 27 in order 748. (31NERC Comments at 7. NERC does not offer a definition of the term “grid impactful SOL,” but we understand it to mean an SOL that the reliability coordinator monitor so that it does not develop into an IROL.)</p> <ol style="list-style-type: none"> Note from TOP-002-3: TOP-008-1 R4 needs to be incorporated. The definition of "Operational Planning Analysis" provides too much latitude in time. Recommend removing the parenthesis in the definition; the entity will make the determination and document (documentation is evidence) the applicability of what it uses for their next day study. 		<p>Standard Drafting Team becomes bogged down dealing with this singular issue. Defining such a term and developing requirements around it may also impact standards in the IRO, FAC, MOD, EOP and TOP families of standards.</p> <ol style="list-style-type: none"> The IRO FYRT notes that there were two recent standard development projects (2006-06 and 2007-03) which focused on delineating the roles and responsibilities of the RC and the TOP. The TOP was removed from the IRO standards and the RC was removed from the TOP standards. Appropriate requirements were developed for each entity. The IRO FYRT does not recommend adding TOP-008-1 to this standard. The IRO FYRT believes this definition should be revisited upon completion of project 2009-02.
<p>IRO-008-1, Requirement R2:</p> <ol style="list-style-type: none"> Real Time Assessment Glossary definition is not clear - what is "immediately available data"? Need to add SOLs. Incorporate "grid impactful SOLs" into its methodology. These are SOLs that can become IROLs. Add a definition to the 	<p>Industry Expert Review Panel Recommendations</p>	<p>IRO FYRT Responses:</p> <ol style="list-style-type: none"> The IRO FYRT believes this definition should be revisited upon completion of project 2009-02. The IRO FYRT acknowledges that there is a concern regarding “grid impactful SOLs” however the FYRT believes that this issue should be addressed in a

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<p>Glossary. Grid impactful SOLs is defined in footnote 31 of paragraph 27 in order 748. (31NERC Comments at 7. NERC does not offer a definition of the term “grid impactful SOL,” but we understand it to mean an SOL that the reliability coordinator monitor so that it does not develop into an IROL.)</p> <p>3. Need to verify whether 30 minutes is correct based on current technology and current common practice (could use state estimator data for five min slices?)</p>		<p>separate standards initiative lest the work of the Standard Drafting Team becomes bogged down dealing with this singular issue. Defining such a term and developing requirements around it may also impact standards in the IRO, FAC, MOD, EOP and TOP families of standards.</p> <p>3. The IRO FYRT believes this definition should be revisited upon completion of project 2009-02.</p>
<p>IRO-008-1, Requirement R3:</p> <p>1. Needs to add critical SOLs Need to add SOLs. Incorporate "grid impactful SOLs" into its methodology. These are SOLs that can become IROLs. Add a definition to the Glossary. Grid impactful SOLs is defined in footnote 31 of paragraph 27 in order 748. (31NERC Comments at 7. NERC does not offer a definition of the term “grid impactful SOL,” but we understand it to mean an SOL that the reliability coordinator monitor so that it does not develop into an IROL.)</p>	<p>Industry Expert Review Panel Recommendations</p>	<p>IRO FYRT Responses:</p> <p>1. The IRO FYRT acknowledges that there is a concern regarding “grid impactful SOLs” however the FYRT believes that this issue should be addressed in a separate standards initiative lest the work of the Standard Drafting Team becomes bogged down dealing with this singular issue. Defining such a term and developing requirements around it may also impact standards in the IRO, FAC, MOD, EOP and TOP families of standards.</p> <p>2. The IRO FYRT believes these definitions should be</p>

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<p>2. Need to define immediately available data (glossary definition for Real Time Assessment) and determine time in the definition of "Operational Planning Analysis" - see notes in R1 and R2.</p>		<p>revisited upon completion of project 2009-02.</p>
<p>IRO-009-1, Requirements R1-R5:</p> <p>Needs to add critical SOLs Need to add SOLs. Incorporate "grid impactful SOLs" into its methodology. These are SOLs that can become IROLs. Add a definition to the Glossary. Grid impactful SOLs is defined in footnote 31 of paragraph 27 in order 748. (31NERC Comments at 7. NERC does not offer a definition of the term "grid impactful SOL," but we understand it to mean an SOL that the reliability coordinator monitor so that it does not develop into an IROL.)</p>	<p>Industry Expert Review Panel Recommendations</p>	<p>The IRO FYRT acknowledges that there is a concern regarding "grid impactful SOLs" however the FYRT believes that this issue should be addressed in a separate standards initiative lest the work of the Standard Drafting Team becomes bogged down dealing with this singular issue. Defining such a term and developing requirements around it may also impact standards in the IRO, FAC, MOD, EOP and TOP families of standards.</p>
<p>IRO-010-1.1a, Requirement R1:</p>	<p>Industry Expert Review Panel</p>	<p>1. The IRO FYRT believes this requirement should be</p>

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<ol style="list-style-type: none"> Does not address level of accuracy required; this detail could come from project 2009-02. Consolidate R1 at minimum; consider consolidating with TOP-003-2 	Recommendations	<p>revisited upon completion of project 2009-02.</p> <ol style="list-style-type: none"> The IRO FYRT notes that there were two recent standard development projects (2006-06 and 2007-03) which focused on delineating the roles and responsibilities of the RC and the TOP. The TOP was removed from the IRO standards and the RC was removed from the TOP standards. Appropriate requirements were developed for each entity. The IRO FYRT does not recommend combining these two standards for this reason.
<p>IRO-010-1.1a, Requirement R2: Consider consolidating with TOP-003-2 R3</p>	Industry Expert Review Panel Recommendations	<p>The IRO FYRT notes that there were two recent standard development projects (2006-06 and 2007-03) which focused on delineating the roles and responsibilities of the RC and the TOP. The TOP was removed from the IRO standards and the RC was removed from the TOP standards. Appropriate requirements were developed for each entity. The IRO FYRT does not recommend combining these two standards for this reason.</p>
<p>IRO-010-1.1a, Requirement R3: Consolidate with TOP-003-2 (R5)</p>	Industry Expert Review Panel	<p>The IRO FYRT notes that there were two recent standard development projects (2006-06 and 2007-03) which focused</p>

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	Recommendations	on delineating the roles and responsibilities of the RC and the TOP. The TOP was removed from the IRO standards and the RC was removed from the TOP standards. Appropriate requirements were developed for each entity. The IRO FYRT does not recommend combining these two standards for this reason.