Review of IRO-005-3-3.1a—Reliability Coordination—Current Day Operations (Filing 2)

http://www.nerc.com/files/IRO-005-3a.pdf

http://www.nerc.com/files/IRO-005-3 1a.pdf

Note: This standard has been updated to reflect an errata change that was approved by FERC on September 13, 2012.

VSLs for Requirement R6:

Standard,	Requirement	Lower	Moderate	High	Severe	Comments
Require-	Language					
ment						
IRO-005-	The Reliability	N/A	The Reliability	The Reliability	The Reliability	Citing a possible
3a 3.1a, R6	Coordinator shall		Coordinator	Coordinator failed	Coordinator failed to	Guideline 3 violation,
	coordinate with		coordinated	to coordinate with	coordinate with	FERC staff asked what
	Transmission		with	Transmission	Transmission	would happen if the
	Operators, Balancing		Transmission	Operators,	Operators, Balancing	RC did not coordinate,
	Authorities, and		Operators,	Balancing	Authorities, and	as needed, in Real
	Generator Operators		Balancing	Authorities, and	Generator Operators	real time only, and
	as needed to develop		Authorities,	Generator	as needed to develop	wondered if all
	and implement		and Generator	Operators as	and implement	aspects of the
	action plans to		Operators, as	needed to	action plans to	requirement were
	mitigate potential or		needed, to	develop and	mitigate potential or	appropriately covered
	actual SOL, CPS, or		develop action	implement action	actual SOL, CPS, or	in the VSL
	DCS violations. The		plans to	plans to mitigate	DCS violations and	assignments.
	Reliability		mitigate	potential or actual	the Reliability	
	Coordinator shall		potential or	SOL, CPS, or DCS	Coordinator failed to	NERC staff agreed and
	coordinate pending		actual SOL,	violations.	coordinate pending	modified the
	generation and		CPS, or DCS		generation and	Moderate VSL
	transmission		violations but	OR	transmission	assignment to
	maintenance outages		failed to		maintenance outages	account for a failure
	with Transmission		implement said	The Reliability	with Transmission	to coordinate in real
	Operators, Balancing		plans ,	Coordinator failed	Operators, Balancing	time only.

Authorities, and		to coordinate	Authorities, and	
Generator Operators	OR	pending	Generator Operators	
as needed in both		generation and	as needed in both	
the real time and	The Reliability	transmission	the real-time and	
next-day reliability	Coordinator	maintenance	next-day reliability	
analysis timeframes.	failed to	outages with	analysis timeframes.	
	coordinate	Transmission		
	pending	Operators,		
	generation and	Balancing		
	transmission	Authorities, and		
	maintenance	Generator		
	outages with	Operators as		
	Transmission	needed in both		
	Operators,	the real-time and		
	Balancing	next-day reliability		
	Authorities,	analysis		
	and Generator	timeframes.		
	Operators as			
	needed in			
	either the Real-			
	<u>real</u> time			
	reliability			
	analysis time			
	frame or the			
	next-day			
	reliability			
	analysis time			
	frame.			

Original Guideline Explanation for R6 VSLs in December 1, 2010 VSL Filing 2:

In accordance with Guideline 2, the VSLs were modified for clarity and consistency with other standards and VSLs.

- Guideline 1: See P. 931-933 of Guideline 1 Analysis in March 5, 2012 VSL Filing 1
- Guideline 2: The VSLs comply with Guideline 2. Additionally, NERC has reviewed the VSL text and has determined that, with the correction of typographical errors, stylistic edits or format changes, the VSL text is clear, specific and objective and does not contain general, relative or subjective language satisfying Guideline 2b. Thus, the text is not subject to the possibility of multiple interpretations of the VSL(s) and provides the clarity needed to permit the consistent and objective application of the VSL(s) in the determination of penalties by the Compliance Enforcement Authority.
- Guideline 3: NERC compared the existing VSLs to the stated requirement language to ensure the VSLs do not redefine or undermine the requirement's reliability goal. In accordance with Guideline 3, the VSL assignments are consistent with the requirement and the degree of compliance can be determined objectively and with certainty.
- Guideline 4: The VSL assignments comply with Guideline 4, because they are based on a single violation of a Reliability Standard and are not based on a cumulative number of violations of the same requirement over a period of time.