

**Compliance Questionnaire and**

**Reliability Standard Audit Worksheet**

**IRO-001-1.1 — Reliability Coordination – Responsibilities and Authorities**

**Registered Entity:** *(Must be completed by the Compliance Enforcement Authority)*

**NCR Number:** *(Must be completed by the Compliance Enforcement Authority)*

**Applicable Function(s): RC, RRO/RE, TOP, BA, GOP, TSP, LSE, PSE**

**Auditors:**

**Disclaimer**

NERC developed this Reliability Standard Audit Worksheet (RSAW) language in order to facilitate NERC’s and the Regional Entities’ assessment of a registered entity’s compliance with this Reliability Standard. The NERC RSAW language is written to specific versions of each NERC Reliability Standard. Entities using this RSAW should choose the version of the RSAW applicable to the Reliability Standard being assessed. While the information included in this RSAW provides some of the methodology that NERC has elected to use to assess compliance with the requirements of the Reliability Standard, this document should not be treated as a substitute for the Reliability Standard or viewed as additional Reliability Standard requirements. In all cases, the Regional Entity should rely on the language contained in the Reliability Standard itself, and not on the language contained in this RSAW, to determine compliance with the Reliability Standard. NERC’s Reliability Standards can be found on NERC’s website at <http://www.nerc.com/page.php?cid=2|20>. Additionally, NERC Reliability Standards are updated frequently, and this RSAW may not necessarily be updated with the same frequency. Therefore, it is imperative that entities treat this RSAW as a reference document only, and not as a substitute or replacement for the Reliability Standard. It is the responsibility of the registered entity to verify its compliance with the latest approved version of the Reliability Standards, by the applicable governmental authority, relevant to its registration status.

The NERC RSAW language contained within this document provides a non‑exclusive list, for informational purposes only, of examples of the types of evidence a registered entity may produce or may be asked to produce to demonstrate compliance with the Reliability Standard. A registered entity’s adherence to the examples contained within this RSAW does not necessarily constitute compliance with the applicable Reliability Standard, and NERC and the Regional Entity using this RSAW reserves the right to request additional evidence from the registered entity that is not included in this RSAW. Additionally, this RSAW includes excerpts from FERC Orders and other regulatory references. The FERC Order cites are provided for ease of reference only, and this document does not necessarily include all applicable Order provisions. In the event of a discrepancy between FERC Orders, and the language included in this document, FERC Orders shall prevail.

# Subject Matter Experts

Identify your company’s subject matter expert(s) responsible for this Reliability Standard. Include the person's title, organization and the requirement(s) for which they are responsible. Insert additional lines if necessary.

**Response: *(Registered Entity Response Required)***

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| **SME Name** | **Title** | **Organization** | **Requirement** |
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Reliability Standard Language

 **IRO-001-1.1 — Reliability Coordination – Responsibilities and Authorities**

**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.

**Applicability:**

 Reliability Coordinators

 Regional Reliability Organizations/Regional Entities

 Transmission Operator

 Balancing Authorities

 Generator Operators

 Transmission Service Providers

 Load Serving Entities

 Purchasing Selling Entities

**NERC BOT Approval Date: 10/29/2008**

**FERC Approval Date: 5/13/2009**

**Reliability Standard Enforcement Date in the United States: 5/13/2009**

**Requirements**:

1. 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.

**Describe, in narrative form, how you meet compliance with this requirement: *(Registered Entity Response Required)***

# R1 Supporting Evidence and Documentation

**Response: *(Registered Entity Response Required)***

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 ***This section must be completed by the Compliance Enforcement Authority.***

**Compliance Assessment Approach Specific to IRO-001-1.1 R1.**

 \_\_ Review the evidence provided by the entity to verify that each Regional Reliability Organization/Regional Entity, subregion, or interregional coordinating group has evidence of signed agreements or other equivalent evidence 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 per the Requirement 1 above.

**Detailed notes:**

1. The Reliability Coordinator shall comply with a regional reliability plan approved by the NERC Operating Committee.

**Describe, in narrative form, how you meet compliance with this requirement: *(Registered Entity Response Required)***

# R2 Supporting Evidence and Documentation

**Response: *(Registered Entity Response Required)***

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***This section must be completed by the Compliance Enforcement Authority.***

**Compliance Assessment Approach Specific to IRO-001-1.1 R2.**

 Review the regional reliability plan approved by the NERC Operating Committee for the

 Reliability Coordinator being reviewed

 Review the evidence provided by the entity to confirm that the Reliability Coordinator’s

 actions/plans/processes/*etc*. have complied with the approved regional reliability plan.

**Detailed notes:**

1. The Reliability Coordinator shall have clear decision-making authority to act and to direct actions to be taken by Transmission Operators, Balancing Authorities, Generator Operators, Transmission Service Providers, Load-Serving Entities, and Purchasing-Selling Entities within its Reliability Coordinator Area to preserve the integrity and reliability of the Bulk Electric System. These actions shall be taken without delay, but no longer than 30 minutes.

**Describe, in narrative form, how you meet compliance with this requirement: *(Registered Entity Response Required)***

**Question:** Please provide a list of the emergency directives issued in the past 45 days to direct Transmission Operators, Balancing Authorities, Generator Operators, Transmission Service Providers, Load-Serving Entities, and Purchasing–Selling Entities within your reliability coordinator area to preserve the integrity and reliability of the Bulk Electric System.

  **Entity** **Response: *(Registered Entity Response Required)***

# R3 Supporting Evidence and Documentation

**Response: *(Registered Entity Response Required)***

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***This section must be completed by the Compliance Enforcement Authority.***

 **Compliance Assessment Approach Specific to IRO-001-1.1 R3.**

 \_\_Review the evidence provided by the entity to confirm the Reliability Coordinator has clear

 decision‑making authority as may be evidenced in its job descriptions, signed agreements,

 authority letter signed by an officer of the company, or other equivalent evidence over the

 entities listed in Requirement 3.

\_\_Review the evidence provided by the entity to confirm that any directives issued by the Reliability Coordinator to entities listed in Requirement 3 have been implemented by those entities within 30 minutes.

 Note: Any exceptions citing Requirement 8 of this Reliability Standard should be verified.

**Detailed notes:**

1. Reliability Coordinators that 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.

**Describe, in narrative form, how you meet compliance with this requirement: *(Registered Entity Response Required)***

# R4 Supporting Evidence and Documentation

**Response: *(Registered Entity Response Required)***

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***This section must be completed by the Compliance Enforcement Authority.***

**Compliance Assessment Approach Specific to IRO-001-1.1 R4:**

 \_\_ Determine if any Reliability Coordinator tasks have been delegated to other entities. If so:

 \_\_ Review the evidence provided by the entity to verify that the Reliability Coordinator

 has current formal operating agreements in place with the entities to which Reliability

 Coordinator tasks are delegated.

 \_\_\_ Review the evidence provided by the entity to determine if and how the Reliability

 Coordinator has verified that all delegated tasks are:

 \_\_\_ Understood

 \_\_\_ Communicated, and

 \_\_\_ Addressed within the Reliability Coordinator Area.

**Detailed notes:**

1. The Reliability Coordinator shall list within its reliability plan all entities to which the Reliability Coordinator has delegated required tasks.

 **Describe, in narrative form, how you meet compliance with this requirement: *(Registered Entity Response Required)***

# R5 Supporting Evidence and Documentation

**Response: *(Registered Entity Response Required)***

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***This section must be completed by the Compliance Enforcement Authority.***

**Compliance Assessment Approach Specific to IRO-001-1.1 R5:**

If the auditor determined in its review of Requirement 4 that the Reliability Coordinator had delegated tasks to another entity:

\_\_\_ Review the evidence provided by the entity to verify that the Reliability Coordinator has

 listed within its documented reliability plan all entities to whom the Reliability Coordinator has

 delegated required tasks.

**Detailed notes:**

1. The Reliability Coordinator shall verify that all delegated tasks are carried out by NERC-certified Reliability Coordinator operating personnel.

 **Describe, in narrative form, how you meet compliance with this requirement: *(Registered Entity Response Required)***

# R6 Supporting Evidence and Documentation

**Response: *(Registered Entity Response Required)***

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***This section must be completed by the Compliance Enforcement Authority.***

**Compliance Assessment Approach Specific to IRO-001-1.1 R6.**

 \_\_\_ Request evidence from the Reliability Coordinator that it has verified that all delegated tasks

 are carried out by NERC-certified Reliability Coordinator operating personnel.

Note: All Reliability Coordinator level certified personnel shall also be carried out by the delegated entity using personnel that have achieved Reliability Coordinator level certification from NERC.

**Detailed notes:**

1. The Reliability Coordinator shall have clear, comprehensive coordination agreements with adjacent Reliability Coordinators to ensure that System Operating Limit or Interconnection Reliability Operating Limit violation mitigation requiring actions in adjacent Reliability Coordinator Areas are coordinated.

 **Describe, in narrative form, how you meet compliance with this requirement: *(Registered Entity Response Required)***

# R7 Supporting Evidence and Documentation

**Response: *(Registered Entity Response Required)***

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***This section must be completed by the Compliance Enforcement Authority.***

**Compliance Assessment Approach Specific to IRO-001-1.1 R7.**

 Verify which Reliability Coordinator Areas are adjacent to the Reliability Coordinator

 being audited.

 Review the evidence provided by the entity to verify that the Reliability Coordinator has

 signed coordination agreements with adjacent Reliability Coordinators to coordinate corrective

 actions in the event SOL and IROL mitigation actions within neighboring areas must be taken.

 If no agreements exist, there is a strong indication that there may be a violation of this

 requirement in the adjacent Reliability Coordinator that may require investigation.

 Review the evidence provided by the entity to verify that the coordination agreements with

 adjacent Reliability Coordinators are:

 \_\_\_Clear,

 \_\_\_Comprehensive, and

 \_\_\_Executed.

**Detailed notes:**

1. Transmission Operators, Balancing Authorities, Generator Operators, Transmission Service Providers, Load-Serving Entities, and Purchasing-Selling Entities shall comply with Reliability Coordinator directives unless such actions would violate safety, equipment, or regulatory or statutory requirements. Under these circumstances, the Transmission Operator, Balancing Authority, Generator Operator, Transmission Service Provider, Load-Serving Entity, or Purchasing-Selling Entity shall immediately inform the Reliability Coordinator of the inability to perform the directive so that the Reliability Coordinator may implement alternate remedial actions.

 **Describe, in narrative form, how you meet compliance with this requirement: *(Registered Entity Response Required)***

**Question:** Have you received any directives from your reliability coordinator during the past 90 days? If you received a directive, did you comply within 30 minutes? If you could not comply, did you immediately notify the RC?

  **Entity** **Response: *(Registered Entity Response Required)***

# R8 Supporting Evidence and Documentation

**Response: *(Registered Entity Response Required)***

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***This section must be completed by the Compliance Enforcement Authority.***

**Compliance Assessment Approach Specific to IRO-001-1.1 R8.**

 Review the evidence provided by the entity to verify that the entities listed in Requirement 8 have operator logs, voice recordings or transcripts of voice recordings, or other equivalent evidence that will be used to confirm that it:

 \_\_\_Complied with the Reliability Coordinator's directives; OR

 If, due to safety, equipment, regulatory or statutory requirements it could not comply, it

 informed the Reliability Coordinator immediately.

**Detailed notes:**

1. 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.

**Describe, in narrative form, how you meet compliance with this requirement: *(Registered Entity Response Required)***

# R9 Supporting Evidence and Documentation

**Response: *(Registered Entity Response Required)***

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***This section must be completed by the Compliance Enforcement Authority.***

**Compliance Assessment Approach Specific to IRO-001-1.1 R9.**

 Determine if any evidence presented shows that the Reliability Coordinator acted in the

 interests of another entity over the interests of reliability for the overall Reliability Coordinator

 Area and the Interconnection.

 Note: This may not be possible to audit during a normal onsite audit, but may lend itself more to an investigation as a result of a complaint.

**Detailed notes:**

# Supplemental Information

**Other ‑** The list of questions above is not all inclusive of evidence required to show compliance with the Reliability Standard. Provide additional information here**, as necessary that** demonstrates compliance with this Reliability Standard.

  **Entity** **Response: *(Registered Entity Response)***

# Compliance Findings Summary (to be filled out by auditor)

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| **Req.** | **NF** | **PV** | **OEA** | **NA** | **Statement** |
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**Excerpts From FERC Orders -- For Reference Purposes Only**

**Updated Through March 31, 2009**

**IRO-001-1.1**

**Order 693**

P 888. The Interconnection Reliability Operations and Coordination (IRO) group of Reliability Standards detail the responsibilities and authorities of a reliability coordinator. The IRO Reliability Standards establish requirements for data, tools and wide-area view, all of which are intended to facilitate a reliability coordinator’s ability to perform its responsibilities and ensure the reliable operation of the interconnected grid.

P 889. IRO-001-1 requires that a reliability coordinator have reliability plans, coordination agreements and the authority to act and direct reliability entities to maintain reliable system operations under normal, contingency and emergency conditions.

P 890. … while the Version 0 Reliability Standard applied to reliability coordinators and regional reliability organizations, IRO-001-1 would in addition apply to transmission operators, balancing authorities, generator operators, transmission service providers, LSEs and purchasing-selling entities. The Version 1 Reliability Standard does not modify or add any Requirements, and it appears that the change in applicability corresponds to existing Requirement R8, which provides that transmission operators, balancing authorities, generator operators, transmission service providers, LSEs and purchasing-selling entities “shall comply with Reliability Coordinator directives unless such actions would violate safety, equipment, or regulatory or statutory requirements.”

P 896. … Accordingly, for the reasons stated in the NOPR, the Commission approves IRO-001-1 as mandatory and enforceable. …

P 898. … When system integrity or reliability is jeopardized, e.g., exceeding IROLs or SOLs, the relevant reliability entities must take corrective control actions to return the system to a secure and reliable state as soon as possible and in no longer than 30 minutes. This is important to satisfy the relevant Reliability Standards such as IRO-005-0 and TOP-004-0 to minimize the amount of time the system operates in an insecure mode and is vulnerable to cascading outages.

**July 19, 2007 Order No. 693-A, Docket No. RM06-16-001**

P 115. …In response to … arguments regarding Measure M2 of IRO-001-1, the Commission does not believe that this measure imposes a requirement that reliability coordinators must have contracts in place. Measure M-2 of IRO-001-1 requires each reliability coordinator to have and provide upon request evidence that it has the authority to have clear decision-making authority to act and to direct actions to be taken by certain users, owners and operators within its area to preserve the integrity and reliability of the bulk electric system. Neither the Reliability Standard nor the Commission prescribed the form of such evidence.

P 119. However, the Commission denied … specific request to modify Requirement R3 of IRO-001-1, explaining that, when system integrity or reliability is jeopardized, e.g., when IROLs or SOLs are exceeded, the relevant reliability entities must take corrective control actions to return the system to a secure and reliable state as soon as possible but not longer than 30 minutes. The Commission believes that this reaction time has been vetted through the industry and that the 30-minute time limit for action is important to minimize the amount of time the system operates in an insecure mode and is vulnerable to cascading outages.

**November 16, 2007 Order on Compliance Filing, Docket Nos. RR07-9-003**

**RR07-10-003**

P 42. … the failure to participate in a time error correction is not necessarily captured by IRO-001-1, Requirement R8. While a balancing authority is obligated by IRO-001-1, Requirement R8 to comply with its reliability coordinator’s directives in this regard, BAL-003, Requirement R3 obligates each balancing authority to comply with the directives of a specific reliability coordinator serving as the Interconnection time monitor, which may not be the same reliability coordinator. …

**Revision History**

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| --- | --- | --- | --- |
| **Version** | **Date** | **Reviewers** | **Revision Description** |
| 1 | December 2010 | QRSAW WG | Revised Findings Table, modified Supporting Evidence tables and Added Revision History |
| 1 | January 2011 | Craig Struck | Reviewed for format consistency and content. |
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