

**Reliability Standard Audit Worksheet[[1]](#footnote-1)**

# IRO-014-3 – Coordination Among Reliability Coordinators

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

|  |  |
| --- | --- |
| **Audit ID:** | Audit ID if available; or REG-NCRnnnnn-YYYYMMDD |
| **Registered Entity:** | Registered name of entity being audited |
| **NCR Number:** | NCRnnnnn |
| **Compliance Enforcement Authority:** | Region or NERC performing audit |
| **Compliance Assessment Date(s)[[2]](#footnote-2):** | Month DD, YYYY, to Month DD, YYYY |
| **Compliance Monitoring Method:** | [On-site Audit | Off-site Audit | Spot Check] |
| **Names of Auditors:** | Supplied by CEA |

**Applicability of Requirements**

|  |  |  |  |  |  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- |
|  | **BA** | **DP** | **GO** | **GOP** | **PA/PC** | **RC** | **RP** | **RSG** | **TO** | **TOP** | **TP** | **TSP** |
| **R1** |  |  |  |  |  | X |  |  |  |  |  |  |
| **R2** |  |  |  |  |  | X |  |  |  |  |  |  |
| **R3** |  |  |  |  |  | X |  |  |  |  |  |  |
| **R4** |  |  |  |  |  | X |  |  |  |  |  |  |
| **R5** |  |  |  |  |  | X |  |  |  |  |  |  |
| **R6** |  |  |  |  |  | X |  |  |  |  |  |  |
| **R7** |  |  |  |  |  | X |  |  |  |  |  |  |

**Legend:**

|  |  |
| --- | --- |
| Text with blue background: | Fixed text – do not edit |
| Text entry area with Green background: | Entity-supplied information |
| Text entry area with white background: | Auditor-supplied information |

Findings

**(This section to be completed by the Compliance Enforcement Authority)**

|  |  |  |  |
| --- | --- | --- | --- |
| **Req.** | **Finding** | **Summary and Documentation** | **Functions Monitored** |
| **R1** |  |  |  |
| **R2** |  |  |  |
| **R3** |  |  |  |
| **R4** |  |  |  |
| **R5** |  |  |  |
| **R6** |  |  |  |
| **R7** |  |  |  |

|  |  |
| --- | --- |
| **Req.** | **Areas of Concern** |
|  |  |
|  |  |
|  |  |

|  |  |
| --- | --- |
| **Req.** | **Recommendations** |
|  |  |
|  |  |
|  |  |

|  |  |
| --- | --- |
| **Req.** | **Positive Observations** |
|  |  |
|  |  |
|  |  |

Subject Matter Experts

Identify the Subject Matter Expert(s) responsible for this Reliability Standard.

**Registered Entity Response (Required; Insert additional rows if needed):**

|  |  |  |  |
| --- | --- | --- | --- |
| **SME Name** | **Title** | **Organization** | **Requirement(s)** |
|  |  |  |  |
|  |  |  |  |
|  |  |  |  |

1. Supporting Evidence and Documentation
2. Each Reliability Coordinator shall have and implement Operating Procedures, Operating Processes, or Operating Plans, for activities that require notification or coordination of actions that may impact adjacent Reliability Coordinator Areas, to support Interconnection reliability. These Operating Procedures, Operating Processes, or Operating Plans shall include, but are not limited to, the following:
   1. Criteria and processes for notifications.
   2. Energy and capacity shortages.
   3. Control of voltage, including the coordination of reactive resources.
   4. Exchange of information including planned and unplanned outage information to support its Operational Planning Analyses and Real-time Assessments.
   5. Provisions for periodic communications to support reliable operations.
3. Each Reliability Coordinator shall have available the latest approved documented version of its Operating Procedures, Operating Processes, and Operating Plans that require notifications, or the coordination of actions among impacted Reliability Coordinators for conditions or activities that impact adjacent Reliability Coordinator Areas. This documentation shall include dated, current in force documentation with the specified elements, and notes from periodic communications.

**Compliance Narrative (Required):**

Provide a brief explanation, in your own words, of how you comply with this Requirement. References to supplied evidence, including links to the appropriate page, are recommended.

Evidence Requested[[3]](#endnote-1):

|  |
| --- |
| **Provide the following evidence, or other evidence to demonstrate compliance.** |
| Operating Procedures, Operating Processes, or Operating Plans, for activities that require notification or coordination of actions that may impact adjacent Reliability Coordinators, to support Interconnection reliability. |
| Evidence of implementation of Operating Procedures, Operating Processes, or Operating Plans. |

Registered Entity Evidence (Required):

|  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- |
| **The following information is requested for each document submitted as evidence. Also, evidence submitted should be highlighted and bookmarked, as appropriate, to identify the exact location where evidence of compliance may be found.** | | | | | |
| **File Name** | **Document Title** | **Revision or Version** | **Document Date** | **Relevant Page(s) or Section(s)** | **Description of Applicability of Document** |
|  |  |  |  |  |  |
|  |  |  |  |  |  |
|  |  |  |  |  |  |

Audit Team Evidence Reviewed (This section to be completed by the Compliance Enforcement Authority):

|  |
| --- |
|  |
|  |
|  |

Compliance Assessment Approach Specific to IRO-014-3, R1

***This section to be completed by the Compliance Enforcement Authority***

|  |  |
| --- | --- |
|  | (R1) Verify the entity’s Operating Procedures, Operating Processes, or Operating Plans, for activities that require notification or coordination of actions that may impact adjacent Reliability Coordinator Areas, to support Interconnection reliability, include the following topics: |
|  | (Part 1.1) Criteria and process for notification. |
|  | (Part 1.2) Energy and capacity shortages. |
|  | (Part 1.3) Control of voltage, including the coordination of reactive resources. |
|  | (Part 1.4) Exchange of information including planned and unplanned outage information to support its Operational Planning Analyses and Real-time Assessments. |
|  | (Part 1.5) Provisions for periodic communications to support reliable operations. |
|  | (R1) Verify the entity implemented its Operating Procedures, Operating Processes, and Operating Plans, for activities that require notification or coordination of actions that may impact adjacent Reliability Coordinator Areas, to support Interconnection reliability. |
| **Note to Auditor**: | |

Auditor Notes:

1. Supporting Evidence and Documentation
2. Each Reliability Coordinator shall maintain its Operating Procedures, Operating Processes, or Operating Plans identified in Requirement R1 as follows:
   1. Review and update annually with no more than 15 months between reviews.
   2. Obtain written agreement from all of the Reliability Coordinators required to take the indicated action(s) for each update.
   3. Distribute to all Reliability Coordinators that are required to take the indicated action(s) within 30 days of an update.
3. Each Reliability Coordinator shall have dated evidence that the Operating Procedures, Operating Processes, and Operating Plans that require one or more other Reliability Coordinators to take action were maintained as specified. This evidence may include but is not limited to dated documentation with confirmation of receipt, dated notice of acceptance or agreement to take specified actions, or dated electronic communications with confirmation of receipt and acceptance or agreement to take specified actions.

**Compliance Narrative (Required):**

Provide a brief explanation, in your own words, of how you comply with this Requirement. References to supplied evidence, including links to the appropriate page, are recommended.

Evidence Requested:i

|  |
| --- |
| **Provide the following evidence, or other evidence to demonstrate compliance.** |
| Evidence the entity reviewed and updated its Operating Procedures, Operating Processes, or Operating Plans identified in Requirement R1 annually with no more than 15 months between reviews. |
| For each update, evidence the entity obtained written agreement from all of the Reliability Coordinators required to take the indicated action(s). |
| For each update, evidence the entity distributed Operating Procedures, Operating Processes, or Operating Plans to all Reliability Coordinators that are required to take the indicated action(s) within 30 days of the update. |

Registered Entity Evidence (Required):

|  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- |
| **The following information is requested for each document submitted as evidence. Also, evidence submitted should be highlighted and bookmarked, as appropriate, to identify the exact location where evidence of compliance may be found.** | | | | | |
| **File Name** | **Document Title** | **Revision or Version** | **Document Date** | **Relevant Page(s) or Section(s)** | **Description of Applicability of Document** |
|  |  |  |  |  |  |
|  |  |  |  |  |  |
|  |  |  |  |  |  |

Audit Team Evidence Reviewed (This section to be completed by the Compliance Enforcement Authority):

|  |
| --- |
|  |
|  |
|  |

Compliance Assessment Approach Specific to IRO-014-3, R2

***This section to be completed by the Compliance Enforcement Authority***

|  |  |
| --- | --- |
|  | (R2) Verify the entity maintained its Operating Procedures, Operating Processes, or Operating Plans identified in Requirement R1 according to the following items: |
|  | (Part 2.1) Reviewed and updated annually with no more than 15 months between reviews. |
|  | (Part 2.2) Obtained written agreement from all of the Reliability Coordinators required to take the indicated action for each update(s). |
|  | (Part 2.3) Distributed update to all Reliability Coordinators required to take action within 30 days of the update. |
| **Note to Auditor**: Annually, in this context, means at least once per calendar year with no more than 15 months between reviews. | |

Auditor Notes:

1. Supporting Evidence and Documentation
2. Each Reliability Coordinator, upon identification of an expected or actual Emergency in its Reliability Coordinator Area, shall notify other impacted Reliability Coordinators.
3. Each Reliability Coordinator shall have and provide evidence which may include but is not limited to operator logs, voice recordings, or transcripts of voice recordings, electronic communications, or equivalent dated documentation, that will be used to determine that it, upon identification of an expected or actual Emergency in its Reliability Coordinator Area, notified other impacted Reliability Coordinators.

**Compliance Narrative (Required):**

Provide a brief explanation, in your own words, of how you comply with this Requirement. References to supplied evidence, including links to the appropriate page, are recommended.

Evidence Requested i:

|  |
| --- |
| **Provide the following evidence, or other evidence to demonstrate compliance.** |
| A list of expected or actual Emergencies that occurred in the entity’s Reliability Coordinator Area. |
| Evidence the entity notified other impacted Reliability Coordinators of expected or actual Emergencies in its Reliability Coordinator Area. |

Registered Entity Evidence (Required):

|  |
| --- |
| **The following information is requested for each document submitted as evidence. Also, evidence submitted should be highlighted and bookmarked, as appropriate, to identify the exact location where evidence of compliance may be found.** |

| **File Name** | **Document Title** | **Revision or Version** | **Document Date** | **Relevant Page(s) or Section(s)** | **Description of Applicability of Document** |
| --- | --- | --- | --- | --- | --- |
|  |  |  |  |  |  |
|  |  |  |  |  |  |
|  |  |  |  |  |  |

Audit Team Evidence Reviewed (This section to be completed by the Compliance Enforcement Authority):

|  |
| --- |
|  |
|  |
|  |

Compliance Assessment Approach Specific to IRO-014-3, R3

***This section to be completed by the Compliance Enforcement Authority***

|  |  |
| --- | --- |
|  | (R3) For all, or a sample of, expected or actual Emergencies, verify the entity notified other impacted Reliability Coordinators. |
| **Note to Auditor**: Auditors are encouraged to monitor compliance during the most critical events on the entity’s system. | |

Auditor Notes:

1. Supporting Evidence and Documentation
2. Each impacted Reliability Coordinator shall operate as though the Emergency exists during each instance where Reliability Coordinators disagree on the existence of an Emergency*.*
3. Each Reliability Coordinator shall have and provide evidence which may include but is not limited to operator logs, voice recordings or transcripts of voice recordings, electronic communications, or equivalent documentation, that will be used to determine that it operated as though an Emergency existed during each instance where Reliability Coordinators disagreed on the existence of an Emergency.

**Compliance Narrative (Required):**

Provide a brief explanation, in your own words, of how you comply with this Requirement. References to supplied evidence, including links to the appropriate page, are recommended.

Evidence Requested:i

|  |
| --- |
| **Provide the following evidence, or other evidence to demonstrate compliance.** |
| A list of instances where the entity disagreed with other Reliability Coordinators regarding the existence of an Emergency. |
| Evidence the entity operated as though an Emergency existed during each instance where the entity disagreed with other Reliability Coordinators regarding the existence of an Emergency. |

Registered Entity Evidence (Required):

|  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- |
| **The following information is requested for each document submitted as evidence. Also, evidence submitted should be highlighted and bookmarked, as appropriate, to identify the exact location where evidence of compliance may be found.** | | | | | |
| **File Name** | **Document Title** | **Revision or Version** | **Document Date** | **Relevant Page(s) or Section(s)** | **Description of Applicability of Document** |
|  |  |  |  |  |  |
|  |  |  |  |  |  |
|  |  |  |  |  |  |

Audit Team Evidence Reviewed (This section to be completed by the Compliance Enforcement Authority):

|  |
| --- |
|  |
|  |
|  |

Compliance Assessment Approach Specific to IRO-014-3, R4

***This section to be completed by the Compliance Enforcement Authority***

|  |  |
| --- | --- |
|  | (R4) For all, or a sample of, instances where the entity disagreed with other Reliability Coordinators regarding the existence of an Emergency, verify the entity operated as though an Emergency existed. |
| **Note to Auditor**: | |

Auditor Notes:

1. Supporting Evidence and Documentation
2. Each Reliability Coordinator that identifies an Emergency in its Reliability Coordinator Area shall develop an action plan to resolve the Emergency during those instances where impacted Reliability Coordinators disagree on the existence of an Emergency.
3. Each Reliability Coordinator that identifies an Emergency in its Reliability Coordinator Area shall have evidence that it developed an action plan during those instances where impacted Reliability Coordinators disagreed on the existence of an Emergency. This evidence may include but is not limited to operator logs, voice recordings or transcripts of voice recordings, electronic communications, or equivalent dated documentation.

**Registered Entity Response (Required):**

**Compliance Narrative (Required):**

Provide a brief explanation, in your own words, of how you comply with this Requirement. References to supplied evidence, including links to the appropriate page, are recommended.

Evidence Requested:i

|  |
| --- |
| **Provide the following evidence, or other evidence to demonstrate compliance.** |
| A list of instances where the entity identified an Emergency in its Reliability Coordinator Area and impacted Reliability Coordinators disagreed on the existence of an Emergency. |
| Evidence the entity developed an action plan to resolve Emergencies during instances where the entity identified an Emergency in its Reliability Coordinator Area and impacted Reliability Coordinators disagreed on the existence of an Emergency. |

Registered Entity Evidence (Required):

|  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- |
| **The following information is requested for each document submitted as evidence. Also, evidence submitted should be highlighted and bookmarked, as appropriate, to identify the exact location where evidence of compliance may be found.** | | | | | |
| **File Name** | **Document Title** | **Revision or Version** | **Document Date** | **Relevant Page(s) or Section(s)** | **Description of Applicability of Document** |
|  |  |  |  |  |  |
|  |  |  |  |  |  |
|  |  |  |  |  |  |

Audit Team Evidence Reviewed (This section to be completed by the Compliance Enforcement Authority):

|  |
| --- |
|  |
|  |
|  |

Compliance Assessment Approach Specific to IRO-014-3, R5

***This section to be completed by the Compliance Enforcement Authority***

|  |  |
| --- | --- |
|  | (R5) For all, or a sample of, instances where the entity identified an Emergency in its Reliability Coordinator Area and impacted Reliability Coordinators disagreed on the existence of an Emergency, verify the entity developed an action plan to resolve the Emergency. |
| **Note to Auditor**: | |

Auditor Notes:

1. Supporting Evidence and Documentation
2. Each impacted Reliability Coordinator shall implement the action plan developed by the Reliability Coordinator that identifies the Emergency during those instances where Reliability Coordinators disagree on the existence of an Emergency, unless such actions would violate safety, equipment, regulatory, or statutory requirements.
3. Each impacted Reliability Coordinator shall have and provide evidence which may include but is not limited to operator logs, voice recordings or transcripts of voice recordings, electronic communications, or equivalent dated documentation, that will be used to determine that it implemented the action plan developed by the Reliability Coordinator who identifies the Emergency when Reliability Coordinators disagree on the existence of an Emergency unless such actions would have violated safety, equipment, regulatory, or statutory requirements.

**Compliance Narrative (Required):**

Provide a brief explanation, in your own words, of how you comply with this Requirement. References to supplied evidence, including links to the appropriate page, are recommended.

Evidence Requested:i

|  |
| --- |
| **Provide the following evidence, or other evidence to demonstrate compliance.** |
| A list of instances where the entity received an action plan from a Reliability Coordinator that identified an Emergency and impacted Reliability Coordinators disagreed on the existence of an Emergency. |
| Evidence the entity implemented the action plan developed by the Reliability Coordinator identifying the Emergency during those instances where Reliability Coordinators disagree on the existence of an Emergency, unless such actions would violate safety, equipment, regulatory, or statutory requirements. |

Registered Entity Evidence (Required):

|  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- |
| **The following information is requested for each document submitted as evidence. Also, evidence submitted should be highlighted and bookmarked, as appropriate, to identify the exact location where evidence of compliance may be found.** | | | | | |
| **File Name** | **Document Title** | **Revision or Version** | **Document Date** | **Relevant Page(s) or Section(s)** | **Description of Applicability of Document** |
|  |  |  |  |  |  |
|  |  |  |  |  |  |
|  |  |  |  |  |  |

Audit Team Evidence Reviewed (This section to be completed by the Compliance Enforcement Authority):

|  |
| --- |
|  |
|  |
|  |

Compliance Assessment Approach Specific to IRO-014-3, R6

***This section to be completed by the Compliance Enforcement Authority***

|  |  |
| --- | --- |
|  | (R6) For all, or a sample of, instances where the entity received an action plan from a Reliability Coordinator that identified an Emergency and the impacted Reliability Coordinators disagreed on the existence of an Emergency, verify the entity implemented the action plan. |
| **Note to Auditor**: | |

Auditor Notes:

1. Supporting Evidence and Documentation
2. Each Reliability Coordinator shall assist Reliability Coordinators, if requested and able, provided that the requesting Reliability Coordinator has implemented its emergency procedures, unless such actions cannot be physically implemented or would violate safety, equipment, regulatory, or statutory requirements.
3. Each Reliability Coordinator shall make available upon request, evidence that requested assistance was provided, if able, to requesting Reliability Coordinators unless such actions could not be physically implemented or would violate safety, equipment, regulatory, or statutory requirements. Such evidence could include but is not limited to dated operator logs, voice recordings or transcripts of voice recordings, electronic communications, or other equivalent evidence in electronic or hard copy format. If such a situation has not occurred, the Reliability Coordinator may provide an attestation.

**Compliance Narrative (Required):**

Provide a brief explanation, in your own words, of how you comply with this Requirement. References to supplied evidence, including links to the appropriate page, are recommended.

Evidence Requested:i

|  |
| --- |
| **Provide the following evidence, or other evidence to demonstrate compliance.** |
| A list of requests for assistance the entity has received from other Reliability Coordinators. |
| Evidence the entity provided requested assistance, if able, to requesting Reliability Coordinators that have implemented its emergency procedures, unless such actions cannot be physically implemented or would violate safety, equipment, regulatory, or statutory requirements. |

Registered Entity Evidence (Required):

|  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- |
| **The following information is requested for each document submitted as evidence. Also, evidence submitted should be highlighted and bookmarked, as appropriate, to identify the exact location where evidence of compliance may be found.** | | | | | |
| **File Name** | **Document Title** | **Revision or Version** | **Document Date** | **Relevant Page(s) or Section(s)** | **Description of Applicability of Document** |
|  |  |  |  |  |  |
|  |  |  |  |  |  |
|  |  |  |  |  |  |

Audit Team Evidence Reviewed (This section to be completed by the Compliance Enforcement Authority):

|  |
| --- |
|  |
|  |
|  |

Compliance Assessment Approach Specific to IRO-014-3, R7

***This section to be completed by the Compliance Enforcement Authority***

|  |  |
| --- | --- |
|  | (R7) For all, or a sample of, instances where assistance was requested by another Reliability Coordinator that had implemented its emergency procedures, verify the entity provided such assistance, if able. If assistance was available and not provided, review evidence to verify that such actions could not be physically implemented or would violate safety, equipment, regulatory, or statutory requirements. |
| **Note to Auditor**: | |

Auditor Notes:

Additional Information:

Reliability Standard



The full text of IRO-014-4 may be found on the NERC Web Site (www.nerc.com) under “Program Areas & Departments”, “Reliability Standards.”

In addition to the Reliability Standard, there is an applicable Implementation Plan available on the NERC Web Site.

Capitalized terms in the Reliability Standard refer to terms in the NERC Glossary, which may be found on the NERC Web Site.

Regulatory Language

[*Transmission Operations Reliability Standards and Interconnection Reliability Operations and Coordination Reliability Standards,* Final Rule, Order No. 817, 153 FERC ¶ 61,178 (2015).](http://www.nerc.com/FilingsOrders/us/FERCOrdersRules/Order%20No.%20817%20Approving%20TOP%20IRO%20Reliability%20Standards.pdf)

5. The Commission approved the initial TOP and IRO Reliability Standards in Order No. 693.[[4]](#footnote-3) On April 16, 2013, in Docket No. RM13-14-000, NERC submitted for Commission approval three revised TOP Reliability Standards to replace the eight currently-effective TOP standards.[[5]](#footnote-4) Additionally, on April 16, 2013, in Docket No. RM13-15-000, NERC submitted for Commission approval four revised IRO Reliability Standards to replace six currently-effective IRO Reliability Standards. On November 21, 2013, the Commission issued the Remand NOPR in which the Commission expressed concern that NERC had “removed critical reliability aspects that are included in the currently-effective standards without adequately addressing these aspects in the proposed standards.” The Commission identified two main concerns and asked for clarification and comment on a number of other issues. Among other things, the Commission expressed concern that the proposed TOP Reliability Standards did not require transmission operators to plan and operate within all SOLs, which is a requirement in the currently-effective standards. In addition, the Commission expressed concern that the proposed IRO Reliability Standards did not require outage coordination.

14. We also determine that the proposed TOP and IRO Reliability Standards should improve reliability by defining an appropriate division of responsibilities between reliability coordinators and transmission operators. The proposed TOP Reliability Standards will eliminate multiple TOP standards, resulting in a more concise set of standards, reducing redundancy and more clearly delineating responsibilities between applicable entities. In addition, we find that the proposed Reliability Standards provide a comprehensive framework as well as important improvements to ensure that the bulk electric system is operated within pre-established limits while enhancing situational awareness and strengthening operations planning. The TOP and IRO Reliability Standards address the coordinated efforts to plan and reliably operate the bulk electric system under both normal and abnormal conditions.

17. Furthermore, the revised definitions of operational planning analysis and real-time assessment are critical components of the proposed TOP and IRO Reliability Standards and, together with the definitions of SOLs, IROLs and operating plans, work to ensure that reliability coordinators, transmission operators and balancing authorities plan and operate the bulk electric system within all SOLs and IROLs to prevent instability, uncontrolled separation, or cascading. In addition, the revised definitions of operational planning analysis and real-time assessment address other concerns raised in the Remand NOPR as well as multiple recommendations in the 2011 Southwest Outage Blackout Report.

19. In the NOPR, the Commission noted that Reliability Standard IRO-017-1, Requirement R1 requires each reliability coordinator to develop, implement and maintain an outage coordination process for generation and transmission outages within its reliability coordinator area. Additionally, Reliability Standard IRO-014-3, Requirement R1, Part 1.4 requires reliability coordinators to include the exchange of planned and unplanned outage information to support operational planning analyses and real-time assessments in the operating procedures, processes, and plans for activities that require coordination with adjacent reliability coordinators. We believe that these proposed standards adequately address our concerns with respect to outage coordination as outlined in the Remand NOPR. However, as we discuss below we direct NERC to modify the standards to include transmission operator monitoring of non-BES facilities, and to specify that data exchange capabilities include redundancy and diverse routing; as well as testing of the alternate or less frequently used data exchange capability, within 18 months of the effective date of this Final Rule.

27. While it appears that regional discrepancies exist regarding the manner for calculating IROLs, we accept NERC’s explanation that this issue is more appropriately addressed in NERC’s Facilities Design, Connections and Maintenance or “FAC” Reliability Standards. NERC indicates that an ongoing FAC-related standards development project - NERC Project 2015-09 (Establish and Communicate System Operating Limits) - will address the development and identification of SOLs and IROLs. We conclude that NERC’s explanation, that the Project 2015-09 standard drafting team will address the clarity and consistency of the requirements for establishing both SOLs and IROLs, is reasonable. Therefore, we will not direct further action on IROLs in the immediate TOP and IRO standard-related rulemaking.51. We agree with NERC and other commenters that there is a reliability need for the reliability coordinator, transmission operator and balancing authority to test alternate data exchange capabilities. However, we are not persuaded by the commenters’ assertions that the need to test is implied in the TOP and IRO Standards. Rather, we determine that testing of alternative data exchange capabilities is important to reliability and should not be left to what may or may not be implied in the standards.Therefore, pursuant to section 215(d)(5) of the FPA, we direct NERC to develop a modification to the TOP and IRO standards that addresses a data exchange capability testing framework for the data exchange capabilities used in the primary control centers to test the alternate or less frequently used data exchange capabilities of the reliability coordinator, transmission operator and balancing authority. We believe that the structure of Reliability Standard COM-001-2, Requirement R9 could be a model for use in the TOP and IRO Standards.

Revision History for RSAW

|  |  |  |  |
| --- | --- | --- | --- |
| **Version** | **Date** | **Reviewers** | **Revision Description** |
| 1 | 06/20/2014 | Initial Posting | New Document |
| 2 | 08/29/2014 | NERC Compliance, NERC Standards, RSAWTF | Revisions for updated standard language and comments received during comment period. |
| 3 | 10/16/2014 | NERC Compliance, NERC Standards | Revisions for comments received during second comment period. |
| 4 | 3/9/2017 | NERC Compliance Assurance, RSAW Task Force | Revised for consistency with the final approved Standard. |

1. 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. 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. [↑](#footnote-ref-1)
2. Compliance Assessment Date(s): The date(s) the actual compliance assessment (on-site audit, off-site spot check, etc.) occurs. [↑](#footnote-ref-2)
3. Items in the Evidence Requested section are suggested evidence that may, but will not necessarily, demonstrate compliance. These items are not mandatory and other forms and types of evidence may be submitted at the entity’s discretion. [↑](#endnote-ref-1)
4. See Mandatory Reliability Standards for the Bulk-Power System, Order No. 693, FERC Stats. & Regs. ¶ 31,242, at P 508, order on reh’g, Order No. 693-A, 120 FERC ¶ 61,053 (2007). In addition, in Order No. 748, the Commission approved revisions to the IRO Reliability Standards. Mandatory Reliability Standards for Interconnection Reliability Operating Limits, Order No. 748, 134 FERC ¶ 61,213 (2011). [↑](#footnote-ref-3)
5. On April 5, 2013, in Docket No. RM13-12-000, NERC proposed revisions to Reliability Standard TOP-006-3 to clarify that transmission operators are responsible for monitoring and reporting available transmission resources and that balancing authorities are responsible for monitoring and reporting available generation resources. [↑](#footnote-ref-4)