

**Compliance Questionnaire and**

**Reliability Standard Audit Worksheet**

**IRO-006-5 — Reliability Coordination — Transmission Loading Relief**

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

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

**Applicable Function(s): RC, BA**

**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-006-5— Reliability Coordination — Transmission Loading Relief**

**Purpose:**

The purpose of this standard is to provide Interconnection-wide transmission loading relief procedures that can be used to prevent or manage potential or actual SOL and IROL violations to maintain reliability of the Bulk Electric System.

**Applicability:**

Reliability Coordinators

Balancing Authorities

**NERC BOT Approval Date:**

**FERC Approval Date:**

**Reliability Standard Enforcement Date in the United States:**

**Requirements:**

**R1.**  Each Reliability Coordinator and Balancing Authority that receives a request pursuant to an

Interconnection- wide transmission loading relief procedure (such as Eastern Interconnection TLR, WECC

Unscheduled Flow Mitigation, or congestion management procedures from the ERCOT Protocols) from any

Reliability Coordinator, Balancing Authority, or Transmission Operator in another Interconnection to curtail

an Interchange Transaction that crosses an Interconnection boundary shall comply with the request, unless it

provides a reliability reason to the requestor why it cannot comply with the request.

**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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|  | **Provide the following:**  **Document Title and/or File Name, Page & Section, Date & Version** | | |
| **Title** | | **Date** | **Version** | |
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| *Audit Team: Additional Evidence Reviewed:* | |  |  | |
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***This section must be completed by the Compliance Enforcement Authority.***

**Compliance Assessment Approach Specific to IRO-006-5 R1.**

Verify that each Reliability Coordinator and Balancing Authority that received a request pursuant

to an Interconnection-wide transmission loading relief procedure (such as Eastern Interconnection

TLR, WECC Unscheduled Flow Mitigation, or congestion management procedures from the

ERCOT Protocols) from any Reliability Coordinator, Balancing Authority, or Transmission

Operator in another Interconnection to curtail an Interchange Transaction that crosses an

Interconnection boundary complied with the request, unless it provided a reliability reason to the

requestor as to why it could not comply with the request.

**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** |
| **1** |  |  |  |  |  |

**Excerpts from FERC Orders -- For Reference Purposes Only**

**Updated Through October 11, 2011**

**IRO-006-5**

**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 952. IRO-006-3 ensures that a reliability coordinator has a coordinated method to alleviate loadings on the transmission system if it becomes congested to avoid limit violations. IRO-006-3 establishes a detailed Transmission Loading Relief (TLR) process for use in the Eastern Interconnection to alleviate loadings on the system by curtailing or changing transactions based on their priorities and according to different levels of TLR procedures.…

P 960. The Commission approves IRO-006-3 as mandatory and enforceable. …

P 961. The Commission remains convinced, based on Blackout Recommendation No. 31, …that proposed directives to include a clear warning that a TLR procedure is an inappropriate and ineffective tool to mitigate IROL violations and to identify the available alternatives to use of the TLR procedure to mitigate an IROL violation are the appropriate improvements to address the deficiencies in using TLR procedures to mitigate actual IROL violations or actual emergency situations. The Commission endorses Blackout Recommendation No. 31.

P 962. The Commission agrees … that TLR procedures can be an effective mechanism to avoid potential IROL violations and potential emergencies. Regarding this, we reiterate that our concerns have always been on the use of TLR to mitigate actual IROLs or actual emergencies, and not on potential IROLs or emergencies, as indicated in the Blackout Report, Staff Assessment and the NOPR.

**July 2, 2008 Order Conditionally Accepting Local Transmission Loading Relief Procedures, Docket No. ER08-928-000**

P 10. Section 1.5.1 of the applicability provision in Attachment 1 of IRO-006-3 permits a Reliability Coordinator in the Eastern Interconnection to implement a Local TLR or congestion management procedure simultaneously with an Interconnection-wide procedure. …

**Order No. 713**

P 49. The Commission notes that an entity is not prevented from using the TLR procedure to avoid a potential IROL violation before a violation occurs. If, while a TLR procedure is in progress, an IROL violation occurs, it is not necessary for the entity to terminate the TLR procedure. However, the Commission believes that it is inappropriate and ineffective to rely on the TLR procedure, even in conjunction with another tool, to address an actual IROL violation.

**North American Electric Reliability Corporation, 135 FERC ¶ 61,043 (2011) (April 21, 2011)**

1. The North American Electric Reliability Corporation (NERC) filed a petition requesting approval of Reliability Standards IRO-006-5 (Transmission Loading Relief (TLR)) and IRO-006-EAST-1 (TLR Procedure for the Eastern Interconnection), Violation Risk Factors (VRF) and Violation Severity Levels (VSL) for those Reliability Standards, and inclusion of the term "Market Flow" in the NERC Glossary of Terms. The Reliability Standards specify communication and coordination requirements relating to Interconnection-wide congestion management procedures and the transfer of power from one Interconnection to another. They also specify planning, communication and coordination requirements for Interconnection-wide congestion management procedures in the Eastern Interconnection. As discussed in this order, we approve the Reliability Standards, VRFs and VSLs, and inclusion of "Market Flow" in the NERC Glossary of Terms.

2. The Commission also approves retirement of Reliability Standard IRO-006-4.1 and its Attachment 1, regional differences within IRO-006-4.1, and removal of the term "Reallocation" from the NERC Glossary of Terms. The new provisions will be effective, and the retired provisions rendered ineffective, on the first day of the first calendar quarter after issuance of this order, as requested by NERC.

5. On January 13, 2011, NERC filed a petition requesting approval of Reliability Standards IRO-006-5 and IRO-006-EAST-1 and their respective VRFs and VSLs, and inclusion of the term "Market Flow" in the NERC Glossary of Terms. NERC states that the new Reliability Standards were developed using the NERC Reliability Standards Development Procedure and approved by the NERC Board of Trustees.

6. NERC states that the current continent-wide Reliability Standard IRO-006-4.1 requires Reliability Coordinators to utilize specific Interconnection-wide procedures. Specifically, IRO-006-4.1 provides details for the Eastern Interconnection procedures in an attachment while only providing hypertext links to the procedures used in the WECC and ERCOT Interconnections.

7. NERC explains that the proposed continent-wide Reliability Standard, IRO-006-5, eliminates the requirements associated with the Interconnection-wide processes and, instead, only references those processes. In doing so, NERC maintains that there is less risk for conflict between the continent-wide standard and the Interconnection (or regional) procedures. In addition, NERC proposes to move all key reliability elements of the Eastern Interconnection Transmission Loading Relief procedure, now found in IRO-006-4.1 and Attachment 1 to IRO-006-4.1, into an Interconnection-wide Reliability Standard of its own, IRO-006-EAST-1. Finally, IRO-006-EAST-1 contains the term "Market Flow," which NERC proposes to add to the NERC Glossary of Terms.

8. NERC requests Commission approval of Reliability Standards IRO-006-5 and IRO-006-EAST-1, their VRFs and VSLs, and addition of "Market Flow" to the NERC Glossary of Terms, each with an effective date as "of the first day of the first calendar quarter after the date the standards are approved by the Commission." n5 NERC also requests retirement of IRO-006-4.1 and its Attachment 1, regional differences within IRO-006-4.1, and removal of the term "Reallocation" from the NERC Glossary of Terms, which according to NERC appears only in IRO-006-4.1. NERC requests that the retirement date coincide with the effective date of IRO-006-5 and IRO-006-EAST-1.

10. We approve Reliability Standards IRO-006-5 and IRO-006-EAST-1, the associated VRFs and VSLs, and inclusion of the term "Market Flow" in the NERC Glossary of Terms. We find that the proposed Reliability Standards are just, reasonable, not unduly discriminatory or preferential, and in the public interest. In addition, we approve the implementation plan proposed by NERC.

A. Reliability Standard IRO-006-5

11. Reliability Standard IRO-006-5 requires coordinated action on Interconnection-wide congestion management procedures across Interconnection boundaries by the applicable Reliability Coordinators. The Reliability Standard requires that if congestion management action in one Interconnection necessitates action from a Reliability Coordinator in another Interconnection, the responding Reliability Coordinator must comply with the request or provide the requesting Reliability Coordinator with a reliability reason why the request cannot be carried out.

12. Reliability Standard IRO-006-5 requires communication and coordination to ensure that a Reliability Coordinator who requests assistance to manage congestion in one Interconnection understands what actions are, or are not, being taken by Reliability Coordinators in other Interconnections to render assistance. Accordingly, IRO-006-5 mandates critical real-time communication and coordination between Reliability Coordinators operating in different Interconnections. The Commission commends NERC on the development of IRO-006-5, which now makes communication and coordination mandatory between Reliability Coordinators in different Interconnections.

13. Reliability Standard IRO-006-5 removes references and associated links to the Interconnection-wide procedures (and regional differences) currently found in IRO-006-4.1 and its Attachment. The Commission agrees that removing these references will eliminate confusion by separating continent-wide requirements from Interconnection procedures (and regional differences therein) for Transmission Loading Relief. As discussed below, the key reliability elements of the Eastern Interconnection Transmission Loading Relief procedures in the Attachment to IRO-006-4.1 will be moved into a separate, Interconnection-wide Reliability Standard, IRO-006-EAST-1. Similarly, a Western Interconnection Transmission Loading Relief standard (IRO-006-WECC-1) has been approved by the Commission n6 and a separate Texas Interconnection Transmission Loading Relief standard (IRO-006-TRE-1) is in development and expected to be filed with the Commission in the second quarter of 2011.

14. Based on the foregoing, the Commission finds that Reliability Standard IRO-006-5 is just, reasonable, not unduly discriminatory or preferential, and in the public interest.

15. The Commission also finds that NERC's VRFs and VSLs for Reliability Standard IRO-006-5 are consistent with the Commission's established guidelines for review of proposed VRFs and VSLs. Accordingly, we approve the VRFs and VSLs proposed by NERC.

16. In sum, the Commission approves Reliability Standard IRO-006-5 and its VRFs and VSLs. As requested by NERC, Reliability Standard IRO-006-5 will be effective on the first day of the first calendar quarter following the date of this order. On that same day, Reliability Standard IRO-006-4.1 will be retired and "Reallocation" removed from the NERC Glossary of Terms.

**Revision History**

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| **Version** | **Date** | **Reviewers** | **Revision Description** |
| 1 | September 2011 | QRSAW WG | Original Document |
| 1 | October 11, 2011 | NERC Legal | Updated Excerpts from FERC orders from March 31, 2009 through and including October 11, 2011. |
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