Standard Development Timeline

This section is maintained by the drafting team during the development of the standard and will be removed when the standard becomes effective.

Development Steps Completed

SAR posted for comment February 21, 2014 to March 24, 2014

First posting from May 19, 2014 to July 2, 2014

Proposed Action Plan and Description of Current Draft

This is the firstsecond posting of the revised standard under Project 2014-03 Revisions to the TOP/IRO Reliability Standards. The SDT is working under a deadline for filing the revised standards with FERC of January 31, 2015.

Anticipated Actions	Anticipated Date
Additional ballot	August 2014
Final ballot	October 2014
вот	November 2014

Version History

Version	Date	Action	Change Tracking
1	October 17, 2008	Adopted by NERC Board of Trustees	
1	March 17, 2011	Order issued by FERC approving IRO- 008-1 (approval effective 5/23/11)	
1	February 28, 2014	Updated VSLs and VRF's based on June 24, 2013 approval.	
2	April 2014 <u>TBD</u>	Changes pursuant to Revisions under Project 2014-03	Revise <u>d</u>

Definitions of Terms Used in Standard

This section includes all newly defined or revised terms used in the proposed standard. Terms already defined in the Reliability Standards Glossary of Terms are not repeated here. New or revised definitions listed below become approved when the proposed standard is approved. When the standard becomes effective, these defined terms will be removed from the individual standard and added to the Glossary.

There are no new or revised definitions proposed in this standard revision.

Real-time Assessment: An evaluation of system conditions using Real-time data to assess existing (pre-Contingency) and potential (post-Contingency) operating conditions. The assessment shall reflect <u>applicable</u> inputs including, but not limited to: load, generation output levels, known Protection System and Special Protection System status or degradation, Transmission outages, generator outages, Interchange, Facility Ratings, and identified phase angle and equipment limitations. (Real-time Assessment may be provided through internal systems or through <u>contractedthird-party</u> services.)

Operational Planning Analysis: An evaluation of projected system conditions to assess anticipated (pre-Contingency) and potential (post-Contingency) conditions for next-day operations. The evaluation shall reflect <u>applicable</u> inputs including, but not limited to, load forecasts; generation output levels; Interchange; known Protection System and Special Protection System status or degradation; Transmission outages; generator outages; Facility Ratings; and identified phase angle and equipment limitations. (Operational Planning Analysis may be provided through internal systems or through <u>contractedthird-party</u> services.)

Rationale - Changes made to the proposed definitions were made in order to respond to issues raised in NOPR paragraphs 55, 73, and 74 dealing with analysis of SOLs in all time horizons, questions on Protection Systems and Special Protection Systems in NOPR paragraph 78, and recommendations on phase angles from the SW Outage Report (recommendation 27). The intent of such changes is to ensure that Real-time Assessments contain sufficient details to result in an appropriate level of situational awareness. Some examples include: 1) analyzing phase angles which may result in the implementation of an Operating Plan to adjust generation or curtail transactions so that a Transmission facility may be returned to service, or 2) evaluating the impact of a modified Contingency resulting from the status change of a Special Protection Scheme from enabled/in-service to disabled/out-of-service.

A. Introduction

- 1. Title: Reliability Coordinator Operational Analyses and Real-time Assessments
- 2. Number: IRO-008-2
- **3. Purpose:** Perform analyses and assessments to prevent instability, uncontrolled separation, or Cascading.

4. Applicability

4.1. Reliability Coordinator.

5. Proposed Effective Date:

The standard shall become effective on the first day of the first calendar quarter that is twelve (12) months after the date that the standard is approved by an applicable governmental authority or as otherwise provided for in a jurisdiction where approval by an applicable governmental authority is required for a standard to go into effect. Where approval by an applicable governmental authority is not required, the standard shall become effective on the first day of the first calendar quarter that is twelve (12) months after the date the standard is adopted by the NERC Board of Trustees or as otherwise provided for in that jurisdiction.

6. Background

On April 16, 2013, NERC submitted two petitions requesting Commission approval of TOP and IRO standards. <u>One petition</u> addresses three revised TOP Reliability Standards: TOP-001-2 (Transmission Operations), TOP-002-3 (Operations Planning), TOP-003-2 (Operational Reliability Data), and one Protection Systems (PRC) Reliability Standard, PRC-001-2 (System Protection Coordination) to replace the eight currentlyeffective TOP standards. The <u>second petition</u> addresses four revised IRO Reliability Standards: IRO-001-3 (Responsibilities and Authorities), IRO-002-3 (Analysis Tools), IRO-005-4 (Current Day Operations), and IRO-014-2 (Coordination Among Reliability Coordinators) to replace six currently-effective IRO standards.

On November 21, 2013, the Commission issued a <u>NOPR</u> proposing to remand these TOP and IRO Standards, stating that NERC "has removed critical reliability aspects that are included in the currently effective standards without adequately addressing these aspects in the proposed standards." For example, the Commission cites the fact that the proposed TOP Standards do not require Transmission Operators to plan and operate within all System Operating Limits ("SOLs"), which is a requirement in the currently effective standards.

On December 20, 2013, NERC filed a <u>motion</u> requesting that the Commission defer action on the NOPR until January 31, 2015 to provide NERC and the industry the opportunity to thoroughly examine the technical concerns raised in the NOPR and afford time to review the proposed TOP and IRO Standards through the NERC standards development process to ensure that a technically justified set of solutions is in place for reliability. That motion to defer action was granted on January 14, 2014. On February 12, 2014, the Standards Committee appointed a Standard Drafting Team to take on the task of revising the aforementioned standards in response to the NOPR issues and the recommendations made by the Independent Expert Review Panel, the IRO FYRT, and the SW Outage Report. See Project 2014-03 project page.

B. Requirements and Measures

Rationale for Requirement R1: Revised in response to NOPR paragraph 96 on the obligation of Reliability Coordinators to monitor SOLs. Measure M1 revised for consistency with TOP-003-3, Measure M1.

- R1. Each Reliability Coordinator shall perform an Operational Planning Analysis that will allow it to assess whether the planned operations for the next-day will exceed System Operating Limits (SOLs) orand Interconnection Operating Reliability Limits (IROLs) within its Reliability Coordinator Wide Area. [Violation Risk Factor: Medium] [Time Horizon: Operations Planning]
- M1. Each Reliability Coordinator shall have evidence of a completed Operational Planning Analysis. Such evidence could include, but is not limited to, dated power flow study results.

Rationale for Requirements R2, R3, and R4: In response to IERP and SW Outage Report recommendations concerning the coordination and review of plans.

- **R2.** Each Reliability Coordinator shall review the Operating Plans for next-day operations provided by its Transmission Operators and Balancing Authorities. [*Violation Risk Factor: Medium*] [*Time Horizon: Operations Planning*]
- M2. Each Reliability Coordinator shall have evidence that it reviewed the Operating Plans for next-day operations provided by its Transmission Operators and Balancing Authorities. Such evidence could include, but is not limited to, dated e-mail messages.
- **R3.** Each Reliability Coordinator shall have a coordinated Operating Plan(s) for next-day operations to address potential System Operating Limit (SOL) and Interconnection Reliability Operating Limit (IROL) exceedances identified as a result of its Operational Planning Analysis as required performed in Requirement R1 while considering the Operating Plans for the next-day provided by its Transmission Operators and Balancing Authorities. [*Violation Risk Factor: Medium*] [*Time Horizon: Operations Planning*]

- **M3.** Each Reliability Coordinator shall have evidence that it has a coordinated Operating Plan for next-day operations to address potential System Operating Limit (SOL) and Interconnection Reliability Operating Limit (IROL) exceedances identified as a result of the Operational Planning Analysis performed in Requirement R1 and thatwhile considersing the Operating Plans for the next-day provided by its Transmission Operators and Balancing Authorities. Such evidence could include, but is not limited to, plans for precluding operating in excess of each SOL and IROL that were identified as a result of the Operational Planning Analysis.
- **R4.** Each Reliability Coordinator shall notify impacted <u>NERC registered</u> entities identified in the Operating Plan(s) cited in Requirement R3 as to their role in those plan(s). [*Violation Risk Factor: Medium*] [*Time Horizon: Operations Planning*]
- M4. Each Reliability Coordinator shall have evidence that it notified impacted NERC registered entities identified in the Operating Plan(s) cited in Requirement R3 as to their role in the plan(s). Such evidence could include but is not limited to dated operator logs, or e-mail records.
- **R5.** Each Reliability Coordinator shall <u>performensure that</u> a Real-time Assessment <u>is</u> <u>performed</u> at least once every 30 minutes. [Violation Risk Factor: High] [Time Horizon: <u>Same-day Operations</u>, Real-time Operations]
- M5. Each Reliability Coordinator shall have, and make available upon request, evidence to show it conductedensured that a Real-<u>T</u>time Assessment is performed at least once every 30 minutes. This evidence could include, but is not limited to, dated computer logs showing times the assessment was conducted, dated checklists, or other evidence.

Rationale for Requirements <u>R5 and</u> <u>R6</u>: <u>Language changed from IROL exceedance to</u> <u>Emergency, as Emergency is a stronger term which includes IROL exceedance and</u> <u>thus raises the bar for this requirement. Requirement R7 is the extension of</u> <u>Requirement R6 ensuring actions are taken to deal with the Emergency.</u> In Requirements <u>R6-R5</u> and <u>R8-R6</u> the use of the term 'impacted' and the tie to the Operating Plan where notification protocols will be set out should minimize the volume of notifications.

R6. Each Reliability Coordinator shall notify impacted Transmission Operators and Balancing Authorities within its Reliability Coordinator Area, and other impacted Reliability Coordinators as indicated in its Operating Plan, when the results of a Realtime Assessment indicate an actual or expected condition that results in, or could result in, a System Operating Limit (SOL) or Interconnection Reliability Operating Limit (IROL) exceedance within its Reliability Coordinator Wide Area. [Violation Risk Factor: High] [Time Horizon: Same-Day Operations, Real-time Operations]

- M6. Each Reliability Coordinator shall make available upon request, evidence that it informed impacted Transmission Operators and Balancing Authorities within its Reliability Coordinator Area, and other impacted Reliability Coordinators as indicated in its Operating Plan, of its actual or expected operations that result in, or could result in, a System Operating Limit (SOL) or Interconnection Reliability Operating Limit (IROL) exceedance. 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. If such a situation has not occurred, the Reliability Coordinator may provide an attestation.
- R7. Each Reliability Coordinator shall issue Operating Instructions, as necessary, to ensure that actions are taken to deal with the System Operating Limit (SOL) or Interconnection Reliability Operating Limit (IROL) exceedance identified in Requirement R6. [Violation Risk Factor: High] [Time Horizon: Same-Day Operations, Real-time Operations]
- M7. Each Reliability Coordinator shall have evidence that it issued Operating Instructions, as necessary, to ensure that actions were taken to deal with the System Operating Limit (SOL) or Interconnection Reliability Operating Limit (IROL) exceedance identified in Requirement R6. Such evidence could include, but is not limited to, dated operator logs, dated records, dated and time-stamped voice recordings or dated transcripts of voice recordings, electronic communications, or equivalent documentation.
- **R8.** Each Reliability Coordinator shall notify impacted Transmission Operators and Balancing Authorities within its Reliability Coordinator Area, and other impacted Reliability Coordinators as indicated in its Operating Plan, when the System Operating Limit (SOL) or Interconnection Reliability Operating Limit (IROL) exceedance identified in Requirement R6 has been prevented or mitigated. [Violation Risk Factor: Medium] [Time Horizon: Same-Day Operations, Real-time Operations]
- M8. Each Reliability Coordinator shall make available upon request, evidence that it informed impacted Transmission Operators and Balancing Authorities within its Reliability Coordinator Area, and other impacted Reliability Coordinators as indicated in its Operating Plan, when the System Operating Limit (SOL) or Interconnection Reliability Operating Limit (IROL) exceedance identified in Requirement R6 has been prevented or mitigated. 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. If such a situation has not occurred, the Reliability Coordinator may provide an attestation.

C. Compliance

- 1. Compliance Monitoring Process
 - 1.1. Compliance Enforcement Authority

As defined in the NERC Rules of Procedure, "Compliance Enforcement Authority" (CEA) means NERC or the Regional Entity in their respective roles of monitoring and enforcing compliance with the NERC Reliability Standards.

1.2. Compliance Monitoring and EnforcementAssessment Processes

Compliance Audit<u>s</u> Self-Certification<u>s</u> Spot-Checking Compliance <u>Violation</u> Investigation Self-Reporting Complaint<u>s</u>

Exception Reporting

As defined in the NERC Rules of Procedure, "Compliance Monitoring and Assessment Processes" refers to the identification of the processes that will be used to evaluate data or information for the purpose of assessing performance or outcomes with the associated reliability standard.

1.3. Data Retention

The following evidence retention periods identify the period of time an entity is required to retain specific evidence to demonstrate compliance. For instances where the evidence retention period specified below is shorter than the time since the last audit, the Compliance Enforcement Authority may ask an entity to provide other evidence to show that it was compliant for the full time period since the last audit.

Each Reliability Coordinator shall keep data or evidence to show compliance for Requirements R1 through R43, R65, and R6 through R8 and Measures M1 through M43, M65, and M6 through M8 for a rolling six month-90 calendar days period for analyses, the most recent three months-90 calendar days for voice recordings, and 12 months for operating logs and e-mail records unless directed by its Compliance Enforcement Authority to retain specific evidence for a longer period of time as part of an investigation.

Each Reliability Coordinator shall each keep data or evidence for Requirement R54 and Measure M54 for the current calendar year and one previous calendar year, with the exception of voice recordings which shall be retained for a minimum of ninety calendar days a rolling 30 calendar day period, unless directed by its Compliance Enforcement Authority to retain specific evidence for a longer period of time as part of an investigation.

If a Reliability Coordinator is found non-compliant, it shall keep information related to the non-compliance until found compliant or the time period specified above, whichever is longer.

The Compliance Enforcement Authority shall keep the last audit records and all requested and submitted subsequent audit records.

1.4. Additional Compliance Information

None

Table of Compliance Elements

			Violation Severity Levels			
R#	Time Horizons	VRF	Lower VSL	Moderate VSL	High VSL	Severe VSL
R1	Operations Planning	Medium	N/A	N/A	N/A	The Reliability Coordinator did not haveperform an Operational Planning Analysis allowing it to assess whether its planned operations for the next-day within its Reliability Coordinator Wide Area will exceed any of its System Operating Limits (SOLs) orand Interconnection Operating Reliability Limits (IROLs).
R2	Operations Planning	Medium	N/A	N/A	N∕A	The Reliability Coordinator did not review the Operating Plans for next day operations provided by its Transmission Operators and Balancing Authorities
R3	Operations Planning	Medium	N/A	N/A	N/A	The Reliability Coordinator did not have a coordinated Operating Plan(s) for next-day operations to address potential System Operating Limit (SOL) and Interconnection Reliability Operating Limit (IROL) exceedances identified as a result

	Time Herizene		Violation Severity Levels						
R#	R#	VKF	Lower VSL	Moderate VSL	High VSL	Severe VSL			
						of its Operational Planning Analysis as requiredperformed in Requirement R1 andwhile considering the Operating Plans for the next-day provided by its Transmission Operators and Balancing Authorities.			
For the you fin reliabil	For the Requirements R4, R6, and R9 VSLs, the intent of the SDT is to start with the Severe VSL first and then to work your way to the left until you find the situation that fits. In this manner, the VSL will not be discriminatory by size. If a Reliability Coordinator has just one affected reliability entity to inform, the intent is that that situation would be a Severe violation								
R4	Operations Planning	Medium	The Reliability Coordinator did not notify one impacted NERC registered entity or 5% or less of the impacted NERC registered entities whichever is less identified in the Operating Plan(s) as to their role in the plan(s).	The Reliability Coordinator did not notify two impacted NERC registered entities or more than 5% and less than or equal to 10% of the impacted NERC registered entities whichever is less, identified in the Operating Plan(s) as to their role in	The Reliability Coordinator did not notify three impacted NERC registered entities or more than 10% and less than or equal to 15% of the impacted NERC registered entities whichever is less, identified in the Operating Plan(s) as to	The Reliability Coordinator did not notify four or more impacted <u>NERC registered</u> entities or more than 15% of the impacted NERC registered entities identified in the Operating Plan(s) as to their role in the plan(s).			

				Vio	lation Severity Leve	ls
R#	Time Horizons	VRF	Lower VSL	Moderate VSL	High VSL	Severe VSL
				the plan(s).	their role in the plan(s).	
R5	Same-day Operations, Real-time Operations	High	The Reliability Coordinator performed Real- time Assessments but did so at a periodicity of more than 30 minutes but less than 35 minutes as averaged over the 30-day data retention period. For any sample 24-hour period within the 30-day retention period, the Reliability Coordinator's Real-time Assessment was not conducted for one 30-minute period within that	The ReliabilityCoordinatorperformed Real-time Assessmentsbut did so at aperiodicity ofmore than orequal to 35minutes and lessthan 40 minutesas averaged overthe 30-day dataretention period.For any sample 24-hour period withinthe 30-dayretention period.For any sample 24-hour period withinthe 30-dayretention period,the ReliabilityCoordinator's Real-time Assessmentwas not conductedfor two 30-minuteperiods within that24-hour period.	The Reliability Coordinator performed Real- time Assessments but did so at a periodicity of more than or equal to 40 minutes and less than 45 minutes as averaged over the 30-day data retention period. For any sample 24-hour period within the 30-day retention period, the Reliability Coordinator's Real-time Assessment was not conducted for three 30-minute	The Reliability Coordinator did not perform Real-time Assessments. OR The Reliability Coordinator performed Real time Assessments but did so at a periodicity of more than or equal to 45 minutes as averaged over the 30 day data retention period. For any sample 24-hour period within the 30-day retention period, the Reliability Coordinator's Real-time Assessment was not conducted for three or more 30-minute periods within that 24-hour period.

					olation Severity Levels		
R#	Time Horizons	VRF	Lower VSL	Moderate VSL	High VSL	Severe VSL	
			24-hour period.		periods within that 24-hour period.		
R6	Same-Day Operations, Real-time Operations	High	The Reliability Coordinator did not notify one impacted Transmission Operator or Balancing Authority within its Reliability Coordinator Area or 5% or less of the impacted Transmission Operators and Balancing Authorities within its Reliability Coordinator Area whichever is less, when the results of its Baal time	The Reliability Coordinator did not notify two impacted Transmission Operators and Balancing Authorities within its Reliability Coordinator Area or more than 5% and less than or equal to 10% of the impacted Transmission Operators and Balancing Authorities within its Reliability Coordinator Area whichever is less, when the results of its Real-time Assossment	The Reliability Coordinator did not notify three impacted Transmission Operators and Balancing Authorities within its Reliability Coordinator Area or more than 10% and less than or equal to 15% of the impacted Transmission Operators and Balancing Authorities within its Reliability Coordinator	The Reliability Coordinator did not notify four or more impacted Transmission Operators and Balancing Authorities within its Reliability Coordinator Area or more than 15% of the impacted Transmission Operators and Balancing Authorities within its Reliability Coordinator Area identified in the Operating Plan(s) as to their role in the plan(s). OR The Reliability Coordinator did not notify the other impacted Reliability Coordinators, as indicated in its Operating Plan, when the results of its Real-time Assessment indicate an actual or expected condition that results in, or could result in, a System Operating Limit (ISOL) or Interconnection Reliability	

	Time Herizona		Violation Severity Levels				
R#	Time Horizons	VKF	Lower VSL	Moderate VSL	High VSL	Severe VSL	
			Assessment indicate an actual or expected condition that results in, or could result in, a System Operating Limit (SOL) or Interconnection Reliability Operating Limit (IROL) exceedance within its Reliability Coordinator Wide Area.	indicate an actual or expected condition that results in, or could result in, a System Operating Limit (SOL) or Interconnection Reliability Operating Limit (IROL) exceedance within its Reliability Coordinator Wide Area.	is less, when the results of its Real-time Assessment indicate an actual or expected condition that results in, or could result in, a System Operating Limit (SOL) or Interconnection Reliability Operating Limit (IROL) exceedance within its Reliability Coordinator Wide Area.	within its Reliability Coordinator Wide Area.	
R7	Same-Day Operations, Real-time Operations	High	N/A	N/A	N/A	The Reliability Coordinator failed to issue Operating Instructions, as necessary, to ensure that actions are <u>were</u> taken to deal with the	

	T ime H erices			els		
R#	Time Horizons	VRF	Lower VSL	Moderate VSL	High VSL	Severe VSL
						System Operating Limit (SOL) or Interconnection Reliability Operating Limit (IROL) exceedance identified in Requirement R6.
R8	Same-Day Operations, Real-time Operations	Medium	The Reliability Coordinator did not notify one impacted Transmission Operator or Balancing Authority within its Reliability Coordinator Area or 5% or less of the impacted Transmission Operators and Balancing Authorities within its Reliability Coordinator Area whichever	The Reliability Coordinator did not notify two impacted Transmission Operators or Balancing Authorities within its Reliability Coordinator Area or more than 5% and less than or equal to 10% of the impacted Transmission Operators and Balancing Authorities within its Reliability Coordinator Area whichever is less,	The Reliability Coordinator did not notify three impacted Transmission Operators or Balancing Authorities within its Reliability Coordinator Area or more than 10% and less than or equal to 15% of the impacted Transmission Operators and Balancing Authorities within its Poliability	The Reliability Coordinator did not notify four or more impacted Transmission Operators or Balancing Authorities within its Reliability Coordinator Area or more than 15% of the impacted Transmission Operators and Balancing Authorities within its Reliability Coordinator Area when the System Operating Limit (SOL) or Interconnection Reliability Operating Limit (IROL) exceedance identified in Requirement R6 has beenwas prevented or mitigated. OR The Reliability Coordinator did not notify four or more other impacted Reliability Coordinators as indicated in its Operating Plan when the System Operating Limit (SOL) or Interconnection

	T ime H erice 1		Violation Severity Levels				
R#	Time Horizons	VKF	Lower VSL	Moderate VSL	High VSL	Severe VSL	
			System	Operating Limit	Coordinator	Reliability Operating Limit (IROL)	
			Operating Limit	(SOL) or	Area whichever	exceedance identified in	
			(SOL) or	Interconnection	is less, when the	Requirement R6 has beenwas	
			Interconnection	Reliability	System	prevented or mitigated.	
			Reliability		Operating Limit		
				(IROL)	(SUL) Of		
			(IKOL)	identified in	Poliability		
			identified in	Requirement R6	Operating Limit		
			Requirement R6	has beenwas			
			has been was	prevented or	exceedance		
			prevented or	mitigated.	identified in		
			mitigated.		Requirement R6		
				OR	has been was		
			OR	The Reliability	prevented or		
			The Reliability	Coordinator did	mitigated.		
			Coordinator did	not notify two			
			not notify one	other impacted	OK		
			other impacted	Reliability	The Reliability		
			Reliability	Coordinators as	Coordinator did		
			Coordinator as	indicated in its	not notify three		
			indicated in its	Operating Plan	other impacted		
			Operating Plan	when the System	Reliability		
			when the	Operating Limit	Coordinators as		
			Emergency	(SOL) or	indicated in its		
			identified in	Interconnection	Operating Plan		
			Requirement R6	Reliability	when the		

	Time Heviters		Violation Severity Levels					
R#	#	VKF	Lower VSL	Moderate VSL	High VSL	Severe VSL		
			has been <u>was</u> prevented or mitigated.	Operating Limit (IROL) exceedance identified in Requirement R6 <u>has beenwas</u> prevented or mitigated.	System Operating Limit (SOL) or Interconnection Reliability Operating Limit (IROL) exceedance identified in Requirement R6 has beenwas prevented or mitigated.			

D. Regional Variances

None

E. Interpretations

None

F. Associated Documents

None

Operating Plan - An Operating Plan includes general Operating Processes and specific Operating Procedures. It may be an overview document which provides a prescription for an Operating Plan for the next-day, or it may be a specific plan to address a specific SOL or IROL exceedance identified in the Operational Planning Analysis (OPA). Consistent with the NERC definition, Operating Plans can be general in nature, or they can be specific plans to address specific reliability issues. The use of the term Operating Plan in the revised TOP/IRO standards allows room for both. An Operating Plan references processes and procedures, including electronic data exchange, which are available to the System Operator on a daily basis to allow the operator to reliably address conditions which may arise throughout the day. It is valid for tomorrow, the day after, and the day after that. Operating Plans should be augmented by temporary operating guides which outline prevention/mitigation plans for specific situations which are identified day-to-day in an OPA or a Real-time Assessment (RTA). As the definition in the Glossary of Terms states, a restoration plan is an example of an Operating Plan. It contains all the overarching principles that the System Operator needs to work his/her way through the restoration process. It is not a specific document written for a specific blackout scenario but rather a collection of tools consisting of processes, procedures, and automated software systems that are available to the operator to use in restoring the system. An Operating Plan can in turn be looked upon in a similar manner. It does not contain a prescription for the specific set-up for tomorrow but contains a treatment of all the processes, procedures, and automated software systems that are at the operator's disposal. The existence of an Operating Plan, however, does not preclude the need for creating specific action plans for specific SOL or IROL exceedances identified in the OPA. When a Reliability Coordinator performs an OPA, the analysis may reveal instances of possible SOL or IROL exceedances for pre- or post-Contingency conditions. In these instances, Reliability Coordinators are expected to ensure that there are plans in place to prevent or mitigate those SOLs or IROLs, should those operating conditions be encountered the next day. The Operating Plan may contain a description of the process by which specific prevention or mitigation plans for day-to-day SOL or IROL exceedances identified in the OPA are handled and communicated. This approach could alleviate any potential administrative burden associated with perceived requirements for continual day-to-day updating of "the Operating Plan document" for compliance purposes.