

Reliability Standard Audit Worksheet¹

IRO-009-2 – Reliability Coordinator Actions to Operate Within IROLs

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: 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 *[RSAW developer to insert correct applicability]*

	BA	DP	GO	GOP	IA	LSE	PA/PC	PSE	RC	RP	RSG	TO	TOP	TP	TSP
R1									X						
R2									X						
R3									X						
R4									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

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.

² Compliance Assessment Date(s): The date(s) the actual compliance assessment (on-site audit, off-site spot check, etc.) occurs.

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Findings

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

Req.	Finding	Summary and Documentation	Functions Monitored
R1			
R2			
R3			
R4			

Req.	Areas of Concern

Req.	Recommendations

Req.	Positive Observations

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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)

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R1 Supporting Evidence and Documentation

- R1.** For each IROL (in its Reliability Coordinator Area) that the Reliability Coordinator identifies one or more days prior to the current day, the Reliability Coordinator shall have one or more Operating Processes, Procedures, or Plans that identify actions the Reliability Coordinator shall take or actions the Reliability Coordinator shall direct others to take (up to and including load shedding):
- 1.1** That can be implemented in time to prevent the identified IROL exceedance.
 - 1.2** To mitigate the magnitude and duration of an IROL exceedance such that the IROL is relieved within the IROL's Tv.
- M1.** Each Reliability Coordinator shall have, and make available upon request, evidence to confirm that it has Operating Processes, Procedures, or Plans to address both preventing and mitigating the magnitude and duration of IROL exceedances in accordance with Requirement R1. This evidence shall include a list of any IROLs (and each associated Tv) identified in advance, along with one or more dated Operating Processes, Procedures, or Plans that that will be used.

Registered Entity Response (Required):

Compliance Narrative:

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 Requestedⁱ:

Provide the following evidence, or other evidence to demonstrate compliance.
A list of any IROLs (and each associated Tv) identified by entity in advance.
All, or a sample of, dated Operating Processes, Procedures, or Plans, as requested by the auditor from the list provided above, identifying actions the entity shall take or direct others to take to prevent or mitigate the IROL exceedances described in Parts 1.1 and 1.2 of Requirement 1.

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):

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Compliance Assessment Approach Specific to IRO-009-2, R1

This section to be completed by the Compliance Enforcement Authority

	(R1) Select all, or a sample of, IROs from entity's list of identified IROs and verify the following:
	(Part 1.1) Entity has one or more Operating Processes, Procedures, or Plans that identify actions it shall take or direct others to take that can be implemented in time to prevent the identified IRO exceedance; and
	(Part 1.2) Entity has one or more Operating Processes, Procedures, or Plans that can be implemented in time to mitigate the magnitude and duration of an IRO exceedance such that it is relieved within the IRO's Tv.
Note to Auditor:	

Auditor Notes:

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R2 Supporting Evidence and Documentation

R2. Each Reliability Coordinator shall initiate one or more Operating Processes, Procedures, or Plans (not limited to the Operating Processes, Procedures, or Plans developed for Requirement R1) that are intended to prevent an IROL exceedance, as identified in the Reliability Coordinator’s Real-time monitoring or Real-time Assessment.

M2. Each Reliability Coordinator shall have, and make available upon request, evidence to confirm that it initiated one or more Operating Processes, Procedures or Plans (not limited to the Operating Processes, Procedures, or Plans developed for Requirements R1) in accordance with Requirement R2. This evidence could include, but is not limited to, Operating Processes, Procedures, or Plans from Requirement R1, dated operating logs, dated voice recordings, dated transcripts of voice recordings, or other evidence.

Registered Entity Response (Required):

Question: Has entity initiated Operating Processes, Procedures, or Plans intended to prevent an IROL exceedance, as identified in the entity’s Real-time monitoring or Real-time Assessment during the compliance monitoring period? Yes No

If yes, identify such instances and proceed to the Compliance Narrative below. If auditor has reasonable assurance of the entity’s No answer, then no further compliance testing of this requirement is necessary. [Note: A separate spreadsheet or other document may be used. If so, provide the document reference below.]

Registered Entity Response (Required):

Compliance Narrative:

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 Requested¹:

Provide the following evidence, or other evidence to demonstrate compliance.
For all instances, or a sample selected by the auditor, where Operating Processes, Procedures, or Plans were initiated as described in Requirement 2, provide evidence such as dated operating logs, voice recordings or transcripts evidencing initiation of the processes, procedures, or 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

DRAFT NERC Reliability Standard Audit Worksheet

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

Compliance Assessment Approach Specific to IRO-009-2, R2

This section to be completed by the Compliance Enforcement Authority

	Review evidence and verify, Operating Processes, Procedures, or Plans were initiated that are intended to prevent an IROL exceedance, as identified in the Reliability Coordinator's Real-time monitoring or Real-time Assessment..
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Note to Auditor:

Auditor Notes:

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R3 Supporting Evidence and Documentation

R3. Each Reliability Coordinator shall act or direct others to act so that the magnitude and duration of an IROL exceedance is mitigated within the IROL’s Tv, as identified in the Reliability Coordinator’s Real-time monitoring or Real-time Assessment.

M3. Each Reliability Coordinator shall have, and make available upon request, evidence to confirm that it acted or directed others to act in accordance with Requirement R3. This evidence could include, but is not limited to, Operating Processes, Procedures, or Plans from Requirement R1, dated operating logs, dated voice recordings, dated transcripts of voice recordings, or other evidence.

Question: Did entity have an IROL exceedance as identified in its Real-time monitoring or Real-time Assessment during the compliance monitoring period? Yes No

If yes, identify such instances and proceed to the Evidence Requested section below. If the auditor has reasonable assurance of entity’s No answer, then no further compliance testing is necessary.

[Note: A separate spreadsheet or other document may be used. If so, provide the document reference below.]

Registered Entity Response (Required):

Compliance Narrative:

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:

Provide the following evidence, or other evidence to demonstrate compliance.
For all or a sample of instances, selected by the auditor, where an entity had an IROL exceedance as identified in its Real-time monitoring or Real-time Assessment, provide evidence such as dated operating logs, voice recordings/transcripts etc. that demonstrate actions were taken to mitigate the magnitude and duration of an IROL exceedance within the IROLs Tv.

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

DRAFT NERC Reliability Standard Audit Worksheet

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

Compliance Assessment Approach Specific to IRO-009-2, R3

This section to be completed by the Compliance Enforcement Authority

	For all, or a sample of, IROL exceedances identified within entities Real-time monitoring or Real-time Assessment, review evidence and verify entity acted or directed others to act so that the magnitude and duration of the IROL exceedance was mitigated within the IROL's Tv.
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Note to Auditor:

Auditor Notes:

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R4 Supporting Evidence and Documentation

- R4.** Each Reliability Coordinator shall operate to the most limiting IROL and Tv in instances where there is a difference in an IROL or its Tv between Reliability Coordinators that are responsible for that Facility (or group of Facilities).
- M4.** Each Reliability Coordinator shall have, and make available upon request, evidence to confirm that it operated to the most limiting IROL and Tv in instances where there was a difference in an IROL or its Tv. Such evidence could include, but is not limited to, dated computer printouts, dated operator logs, dated voice recordings, dated transcripts of voice recordings, or other equivalent evidence in accordance with Requirement R4.

Registered Entity Response (Required):

Question: Did entity have any instances where there was a difference in an IROL or its Tv between Reliability Coordinators responsible for a Facility (or group of Facilities)? Yes No

If yes, identify such instances and proceed to the Evidence Requested section below. If auditor has reasonable assurance of entity's No answer, then no further compliance testing of this requirement is necessary.

[Note: A separate spreadsheet or other document may be used. If so, provide the document reference below.]

Registered Entity Response (Required):

Compliance Narrative:

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 Requested¹:

Provide the following evidence, or other evidence to demonstrate compliance.
For all, or a sample of, instances, as requested by the auditor, where there were differences in IROLs or its Tv as described in Requirement 4, provide evidence such as dated computer printouts, operator logs, voice recordings/transcripts etc. demonstrating entity operated to the most limiting IROL and Tv.

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

DRAFT NERC Reliability Standard Audit Worksheet

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

Compliance Assessment Approach Specific to IRO-009-2, R4

This section to be completed by the Compliance Enforcement Authority

	For all, or a sample of, instances where there was a difference in an IROL or its Tv as described in Requirement 4, verify entity operated to the most limiting IROL and Tv.
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Note to Auditor:

Auditor Notes:

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Additional Information:

Reliability Standard

The full text of IRO-009-2 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.

In addition to the Reliability Standard, there is background information 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 [\[Developer to ensure RSAW has been provided to NERC Legal for links to appropriate Regulatory Language – See example below\]](#)

E.g. FERC Order No. 742 paragraph 34: “Based on NERC’s.....”

E.g. FERC Order No. 742 Paragraph 55, Commission Determination: “We affirm NERC’s.....”

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Revision History for RSAW

Version	Date	Reviewers	Revision Description
1	6/2/2015	NERC Compliance, NERC Standards, Standard Drafting Team, RSAW Task Group	New Document

ⁱ 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.

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