

# Implementation Plan and Mapping Document

## IRO-001-3 Reliability Coordination – Responsibilities and Authorities

### **Requested Approval**

The RC SDT requests the approval of IRO-001-3 – Reliability Coordination – Responsibilities and Authorities.

### **Requested Retirement**

The RC SDT request the retirement of standard IRO-001-2 – Responsibilities and Authorities, Requirements R1 and R2, and the associated sub-requirements.

### **Prerequisite Approvals**

None.

### **Defined Terms in the NERC Glossary**

The RC SDT proposes the following new definition:

**Reliability Directive:** A communication initiated by a Reliability Coordinator, Transmission Operator or Balancing Authority where action by the recipient is necessary to address an Emergency or Adverse Reliability Impact.

### **Conforming Changes to Requirements in Already Approved Standards**

None.

### **Revision Summary**

The RC SDT is proposing the following revisions. Requirement, R1 will be retired because it is addressed in the NERC Rules of Procedure, Section 501 and 503. Requirements, R2 and R5 are proposed for retirement. Requirement, R3 will become the new Requirement R1, the authority to act and direct others to act, which may include Reliability Directives. Requirement, R4 is proposed for retirement because it is redundant with the NERC Rules of Procedure, Section 501 and 508. Requirement, R6 is proposed for retirement because PER-003-0 provides the necessary reliability replacement with no gap in reliability. Requirement, R7 is proposed for retirement because IRO-014-2, R1 provides the necessary reliability replacement with no gap in reliability. Requirement, R8 is proposed for replacement by the new IRO-001-3, Requirement R2 and R3. Requirements, R9 is proposed for retirement because it is redundant with other requirements and it is covered under the Reliability Coordinator's Standard of Conduct.

### Applicable Entities

- Reliability Coordinator
- Balancing Authority
- Transmission Operator Generator Operator
- Distribution Provider

### Effective Dates

The first day of the second calendar quarter beyond the date that this standard is approved by applicable regulatory authorities, or in those jurisdictions where regulatory approval is not required, the standard becomes effective on the first day of the first calendar quarter beyond the date this standard is approved by the NERC Board of Trustees, or as otherwise made effective pursuant to the laws applicable to such ERO governmental authorities.

### New or Revised Standard

IRO-001-3      In those jurisdictions where regulatory approval is required, this standard shall become effective on the first day of the second calendar quarter after applicable regulatory approval. In those jurisdictions where no regulatory approval is required, this standard shall become effective on the first day of the first calendar quarter after Board of Trustees adoption.

### Standard for Retirement

IRO-001-2      Midnight of the day immediately prior to the Effective Date of IRO-001-3 in the particular Jurisdiction in which the new standard is becoming effective.

### Implementation Plan for Definition

**Reliability Directive:** Entities shall use this definition when implementing the standard IRO-001-3, which uses this defined term.

**Revisions or Retirements to Already Approved Standards**

The following tables identify the sections of approved standards that shall be retired or revised when this standard becomes effective. If the drafting team is recommending the retirement or revision of a requirement, that text is blue.

Already Approved Standard	Proposed Replacement Requirement(s)
<p><b>IRO-001-1</b></p> <p><b>R1.</b> Each Regional Reliability Organization, subregion, or interregional coordinating group shall establish one or more Reliability Coordinators to continuously assess transmission reliability and coordinate emergency operations among the operating entities within the region and across the regional boundaries. <i>[Violation Risk Factor: High]</i></p>	<p>The RC SDT proposes retiring the requirement as it is addressed in the NERC Rules of Procedure, March 15, 2012:</p> <p>Section 503, 2 (2.1)</p> <p>“Regional Entities shall verify that all Reliability Coordinators, Balancing Authorities, and Transmission Operators meet the Registration requirements of Section 501(1.4).”</p> <p>Section 501 (1.4)</p> <p>“1.4 For all geographical or electrical areas of the Bulk Power System, the Registration process shall ensure that (1) no areas are lacking any entities to perform the duties and tasks identified in and required by the Reliability Standards to the fullest extent practical, and (2) there is no unnecessary duplication of such coverage or of required oversight of such coverage. In particular the process shall:</p> <p style="padding-left: 40px;">1.4.1 Ensure that all areas are under the oversight of one and</p>

Already Approved Standard	Proposed Replacement Requirement(s)
	<p>only one Reliability Coordinator.</p> <p>1.4.2 Ensure that all Balancing Authorities and Transmission Operator entities<sup>1</sup> are under the responsibility of one and only one Reliability Coordinator.</p> <p>1.4.3 Ensure that all transmission Facilities of the Bulk Power System are the responsibility and under the control of one and only one Transmission Planner, Planning Authority, and Transmission Operator.</p> <p>1.4.4 Ensure that all loads and generators are under the responsibility and control of one and only one Balancing Authority.”</p>
<p><b>Notes:</b></p>	
<p><b>IRO-001-1</b></p> <p><b>R2.</b> The Reliability Coordinator shall comply with a regional reliability plan approved by the NERC Operating Committee. <i>[Violation Risk Factor: High]</i></p> <p><b>R5.</b> The Reliability Coordinator shall list within its reliability plan all entities to which the Reliability Coordinator has delegated required tasks. <i>[Violation Risk Factor: Lower]</i></p>	<p><b>None</b> – The RC SDT proposes retiring the requirements.</p>
<p><b>Notes:</b> The RC SDT proposes retiring R2 and R5 as the regional reliability plan is a “how” document that shows how a Reliability</p>	

<sup>1</sup> Some organizations perform the listed functions (e.g., Balancing Authority, Transmission Operator) over areas that transcend the Footprints of more than one Reliability Coordinator. Such organizations will have multiple Registrations, with each such Registration corresponding to that portion of the organization’s overall area that is within the Footprint of a particular Reliability Coordinator.

Already Approved Standard	Proposed Replacement Requirement(s)
<p>Coordinator will comply with all other NERC Standards, making this requirement redundant.</p>	
<p><b>IRO-001-1</b></p> <p><b>R3.</b> The Reliability Coordinator shall have clear decision-making authority to act and direct actions to be taken by Transmission Operators, Balancing Authorities, Generator Operators, Transmission Service Providers, Load-Serving Entities and Purchasing-Selling Entities within its Reliability Coordinator Area to preserve the integrity and reliability of the Bulk Electric System. These actions shall be taken without delay, but no longer than 30 minutes. <i>[Violation Risk Factor: High]</i></p>	<p><b>IRO-001-3</b></p> <p><b>R1.</b> Each Reliability Coordinator shall take have the authority to actions or direct others to actions (which could include issuing Reliability Directives) to prevent identified events or mitigate the magnitude or duration of actual events that result in an Emergency or Adverse Reliability Impacts. <i>[Violation Risk Factor: High][Time Horizon: Real-time Operations, Same Day Operations and Operations Planning]</i></p>
<p><b>Notes:</b> The RC SDT is proposing that the last sentence of R3 be retired. The timing of RC response to events varies based on system conditions. The specific timing criteria for responses to IROs are contained in other standards (e.g., TOP-007, R2). This will add clarity and measurability to the standard. The last part of the second sentence should be removed as it is implicit in IRO-001-1, R1, which states that the Reliability Coordination will act or direct actions to mitigate issues. Additionally, stakeholders indicated issues with the ability to measure compliance with the phrase, “without intentional delay” and this was removed.</p>	
<p><b>IRO-001-1</b></p> <p><b>R4.</b> Reliability Coordinators that delegate tasks to other entities shall have formal operating agreements with each entity to which tasks are delegated. The Reliability Coordinator shall verify that all delegated tasks are understood, communicated, and addressed within its Reliability Coordinator Area. All responsibilities for complying with NERC and regional standards applicable to Reliability</p>	<p><b>None – The RC SDT proposes retiring the requirement.</b></p> <p>RC SDT contends that original IRO-001-1, R4 is redundant with NERC Rules of Procedure, Section 500 (March 15, 2012) and should be retired from the standard.</p> <p>(Section 501)</p>

Already Approved Standard	Proposed Replacement Requirement(s)
<p>Coordinators shall remain with the Reliability Coordinator.  <i>[Violation Risk Factor: Medium]</i></p>	<p>“The purpose of the Organization Registration Program is to clearly identify those entities that are responsible for compliance with the FERC approved Reliability Standards. Organizations that are registered are included on the NERC Compliance Registry (NCR) and are responsible for knowing the content of and for complying with all applicable Reliability Standards.”</p> <p>(Section 508)</p> <p><b>Provisions Relating to Coordinated Functional Registration (CFR) Entities</b></p> <p>In addition to registering as an entity responsible for all functions that it performs itself, multiple entities may each register using a CFR for one or more Reliability Standard(s) and/or for one or more Requirements/sub-Requirements within particular Reliability Standard(s) applicable to a specific function. The CFR submission must include a written agreement that governs itself and clearly specifies the entities’ respective compliance responsibilities. The Registration of the CFR is the complete Registration for each entity. Additionally, each entity shall take full compliance responsibility for those Reliability Standards and/or Requirements/sub-Requirements it has registered for in the CFR. Neither NERC nor the Regional Entity shall be parties to any such agreement, nor shall NERC or the Regional Entity have responsibility for reviewing or approving any such agreement, other than to verify that the agreement provides for an allocation or assignment of responsibilities consistent with the CFR.</p>

Already Approved Standard	Proposed Replacement Requirement(s)
<p><b>Notes:</b> Section 508 addresses written agreements.</p>	
<p><b>IRO-001-1</b></p> <p><b>R6.</b> The Reliability Coordinator shall verify that all delegated tasks are carried out by NERC-certified Reliability Coordinator operating personnel. <i>[Violation Risk Factor: Medium]</i></p>	<p><b>None</b> – The RC SDT proposes retiring the requirement because it is covered by PER-003-0, R1.</p> <p><b>PER-003-0</b></p> <p><b>R1.</b> Each Transmission Operator, Balancing Authority, and Reliability Coordinator shall staff all operating positions that meet both of the following criteria with personnel that are NERC certified for the applicable functions:</p> <ul style="list-style-type: none"> <li><b>R1.1.</b> Positions that have the primary responsibility, either directly or through communications with others, for the real-time operation of the interconnected Bulk Electric System.</li> <li><b>R1.2.</b> Positions directly responsible for complying with NERC standards.</li> </ul>
<p><b>Notes:</b> The RC SDT recommends retiring IRO-001-1, R6 as it is redundant with PER-003-0, R1, R1.1., and R1.2.</p>	
<p><b>IRO-001-1</b></p> <p><b>R7.</b> The Reliability Coordinator shall have clear, comprehensive coordination agreements with adjacent Reliability Coordinators to ensure that System Operating Limit (SOL) or Interconnection Reliability Operating Limit (IROL) violation mitigation requiring actions in adjacent Reliability</p>	<p><b>None</b> – The RC SDT proposes retiring the requirement because it is covered by IRO-014-2, R1.</p> <p><b>IRO-014-2</b></p> <p><b>R1.</b> Each Reliability Coordinator shall have Operating Procedures, Operating Processes, or Operating Plans for activities that require</p>

Already Approved Standard	Proposed Replacement Requirement(s)
<p>Coordinator Areas are coordinated. <i>[Violation Risk Factor: High]</i></p>	<p>notification, exchange of information or coordination of actions that may impact other Reliability Coordinator Areas to support Interconnection reliability. These Operating Procedures, Processes, or Plans shall collectively address the following: <i>[Violation Risk Factor: Medium] [Time Horizon: Same Day Operations and Operations Planning]</i></p>
<p><b>Notes:</b> The RC SDT proposes retiring the retirement of IRO-001-1, R7 as this is redundant with IRO-014-1 R1.</p>	
<p><b>IRO-001-1</b></p> <p><b>R8:</b> Transmission Operators, Balancing Authorities, Generator Operators, Transmission Service Providers, Load-Serving Entities, and Purchasing-Selling Entities shall comply with Reliability Coordinator directives unless such actions would violate safety, equipment, or regulatory or statutory requirements. Under these circumstances, the Transmission Operator, Balancing Authority, Generator Operator, Transmission Service Provider, Load-Serving Entity, or Purchasing-Selling Entity shall immediately inform the Reliability Coordinator of the inability to perform the directive so that the Reliability Coordinator may implement alternate remedial actions. <i>[Violation Risk Factor: High]</i></p>	<p><b>IRO-001-3</b></p> <p><b>R2.</b> Each Transmission Operator, Balancing Authority, Generator Operator, and <b>Distribution Provider</b> shall comply with its Reliability Coordinator’s direction unless compliance with the direction cannot be physically implemented or unless such actions would violate safety, equipment, regulatory or statutory requirements. <i>[Violation Risk Factor: High] [Time Horizon: Real-time Operations, Same Day Operations and Operations Planning]</i></p> <p><b>R3.</b> Each Transmission Operator, Balancing Authority, Generator Operator, and <b>Distribution Provider</b> shall inform its Reliability Coordinator upon recognition of its inability to perform as directed in accordance with Requirement R2. <i>[Violation Risk Factor: High] [Time Horizon: Real-time Operations, Same Day Operations and Operations Planning]</i></p>
<p><b>Notes:</b> The RC SDT added the Distribution Provider per FERC Order 693. The RC SDT proposes the replacement of IRO-001-1, R8 with two requirements IRO-001-3, R2, and R3.</p> <p>The Distribution Provider was added as an applicable entity per FERC Order 693.</p>	

Already Approved Standard	Proposed Replacement Requirement(s)
<p><b>IRO-001-1</b></p> <p><b>R9.</b> The Reliability Coordinator shall act in the interests of reliability for the overall Reliability Coordinator Area and the Interconnection before the interests of any other entity.  <i>[Violation Risk Factor: High]</i></p>	<p><b>None</b> – Retire requirement because it is redundant.</p>
<p><b>Notes:</b> The RC SDT proposes retiring this requirement. All Reliability Coordinator Standard Requirements are developed so that the Reliability Coordinator shall act in the interest of reliability for the RC Area and the Interconnection. Section 6 of the NERC Standard Development Procedure states that NERC develops and maintains Reliability Standards. Equity issues are covered under the Reliability Coordinator Standards of Conduct.</p>	

**Functions that Must Comply with the Requirements in the Standards**

Standard	Functions that Must Comply With the Requirements							
	Reliability Coordinator	Balancing Authority	Distribution Provider	Transmission Operator	Transmission Service Provider	Purchasing Selling Entity	Generator Operator	Load Serving Entity
IRO-001-2	X	X	X	X			X	