

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

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

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

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| **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**

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|  | **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:**

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| --- | --- |
| 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)**

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

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| **Req.** | **Areas of Concern** |
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| **Req.** | **Recommendations** |
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| **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):**

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| **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 exceedance 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):**

**Question:** Did the entity identify any IROLs one or more days prior to current day during the compliance monitoring period?  Yes  No

[If Yes, identify such instances and proceed to the Compliance Narrative below. If No, then proceed to the Compliance Narrative below.]

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

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| **Provide the following evidence, or other evidence to demonstrate compliance.** |
| A list of any IROLs (and each associated Tv) identified by the entity in advance. |
| All, or a requested 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 R1. |

Registered Entity Evidence (Required):

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| --- | --- | --- | --- | --- | --- |
| **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** |
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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***

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|  | (R1) Select all, or a sample of, IROLs from entity’s list of identified IROLs and verify the following: |
|  | (Part 1.1) The 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 IROL exceedance; and |
|  | (Part 1.2) The entity has one or more Operating Processes, Procedures, or Plans that can be implemented in time to mitigate the magnitude and duration of an IROL exceedance such that it is relieved within the IROL’s Tv. |
| **Note to Auditor:** | |

Auditor Notes:

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 the 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 No, then proceed to the Compliance Narrative below.]

[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 Requestedi:

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| **Provide the following evidence, or other evidence to demonstrate compliance.** |
| For all, or a requested sample of, instances selected by the auditor where Operating Processes, Procedures, or Plans were initiated as described in Requirement R2, provide evidence such as dated operating logs, voice recordings or transcripts evidencing initiation of the processes, procedures, or plans. |

Registered Entity Evidence (Required):

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| **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** |
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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, R2

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

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|  | Review evidence and verify the 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. |
| **Note to Auditor:** | |

Auditor Notes:

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, dated operating logs, dated voice recordings, dated transcripts of voice recordings, or other evidence.

**Question:** Did the 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 Compliance Narrative section below. If No, proceed to the Compliance Narrative section below.]

[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 Requestedi:

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

Registered Entity Evidence (Required):

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| **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** |
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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, R3

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

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

Auditor Notes:

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 the 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 Compliance Narrative section below. If No, proceed to the Compliance Narrative section below.]

[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 Requestedi:

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| **Provide the following evidence, or other evidence to demonstrate compliance.** |
| For all, or a requested sample of, instances selected by the auditor where there were differences in IROLs or its Tv, as described in Requirement R4, provide evidence such as dated computer printouts, operator logs, or voice recordings/transcripts demonstrating the entity operated to the most limiting IROL and Tv. |

Registered Entity Evidence (Required):

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| --- | --- | --- | --- | --- | --- |
| **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** |
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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, R4

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

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|  | For all, or a sample of, instances where there was a difference in an IROL or its Tv, as described in Requirement R4, verify the entity operated to the most limiting IROL and Tv. |
| **Note to Auditor:** | |

Auditor Notes:

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

[**North American Electric Reliability Corp.., Docket No. RD15-7-000 (Dec. 4, 2015) (letter order).**](http://www.nerc.com/FilingsOrders/us/FERCOrdersRules/Letter%20Order%20Approving%20IRO-006-EAST-2%20and%20%20IRO-009-2%20Reliability%20Standards.pdf) Order approving proposed Reliability Standards IRO-006-EAST-2 and IRO-009-2.

Page 2. In approving IRO-009-2, the Commission noted that: “NERC explains that the proposed Reliability Standard IRO-009-2 is an improvement to the existing version of the standard because it combines two existing requirements, revises existing language to clearly delineate applicable entities and the specific actions required, and removes unnecessary language.”

Revision History for RSAW

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| --- | --- | --- | --- |
| **Version** | **Date** | **Reviewers** | **Revision Description** |
| 1 | 6/2/2015 | NERC Compliance, NERC Standards, RSAW Task Group | New Document |
| 2 | 12/22/2015 | NERC Compliance Assurance, NERC Standards, RSAW Task Force | Revised for consistency with the language in the final approved Standard. |
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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)