# Exhibit A

**Proposed Reliability Standards and Definitions** 

# Reliability Standard IRO-001-4

### A. Introduction

**1. Title**: Reliability Coordination – Responsibilities

**2. Number**: IRO-001-4

**3. Purpose:** To establish the responsibility of Reliability Coordinators to act or direct other entities to act.

## 4. Applicability

**4.1.** Reliability Coordinator

**4.2.** Transmission Operator

**4.3.** Balancing Authority

**4.4.** Generator Operator

4.5. Distribution Provider

#### 5. Effective Date:

See Implementation Plan.

# 6. Background:

See the Project 2014-03 project page.

# **B.** Requirements and Measures

- **R1.** Each Reliability Coordinator shall act to address the reliability of its Reliability Coordinator Area via direct actions or by issuing Operating Instructions. [Violation Risk Factor: High][Time Horizon: Same-Day Operations, Real-time Operations]
- **M1.** Each Reliability Coordinator shall have and provide evidence which may 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, that will be used to determine that it acted to address the reliability of its Reliability Coordinator Area via direct actions or by issuing Operating Instructions.
- **R2.** Each Transmission Operator, Balancing Authority, Generator Operator, and Distribution Provider shall comply with its Reliability Coordinator's Operating Instructions unless compliance with the Operating Instructions cannot be physically implemented or unless such actions would violate safety, equipment, regulatory, or statutory requirements. [Violation Risk Factor: High] [Time Horizon: Same-Day Operations, Real-time Operations]
- **M2.** Each Transmission Operator, Balancing Authority, Generator Operator, and Distribution Provider shall have and provide evidence which may 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, that will be used to determine that it complied with its Reliability Coordinator's Operating Instructions, unless the instruction could not be physically implemented, or such actions would have violated safety, equipment, regulatory or statutory requirements. In such cases, the Transmission Operator, Balancing Authority, Generator Operator, or Distribution Provider shall have and provide copies of the safety, equipment, regulatory, or statutory requirements as evidence for not complying with the Reliability Coordinator's Operating Instructions. If such a situation has not occurred, the Transmission Operator, Balancing Authority, Generator Operator, or Distribution Provider may provide an attestation.

- R3. Each Transmission Operator, Balancing Authority, Generator Operator, and Distribution Provider shall inform its Reliability Coordinator of its inability to perform the Operating Instruction issued by its Reliability Coordinator in Requirement R1. [Violation Risk Factor: High] [Time Horizon: Same-Day Operations, Real-time Operations]
- M3. Each Transmission Operator, Balancing Authority, Generator Operator, and Distribution Provider shall have and provide evidence which may 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, that will be used to determine that it informed its Reliability Coordinator of its inability to perform an Operating Instruction issued by its Reliability Coordinator in Requirement R1.

# 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 Assessment Processes:

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.

The Reliability Coordinator, Transmission Operator, Balancing Authority, Generator Operator, and Distribution Provider shall keep data or evidence to show compliance as identified below unless directed by its Compliance Enforcement Authority to retain specific evidence for a longer period of time as part of an investigation:

- The Reliability Coordinator for Requirement R1, Measure M1 shall retain voice recordings for the most recent 90-calendar days and documentation for the most recent 12-calendar months.
- The Transmission Operator, Balancing Authority, Generator Operator, and Distribution Provider for Requirements R2 and R3, Measures M2 and M3 shall retain voice recordings for the most recent 90-calendar days and documentation for the most recent 12-calendar months.

If a Reliability Coordinator, Transmission Operator, Balancing Authority, Generator Operator, or Distribution Provider is found non-compliant, it shall keep information related to the non-compliance until mitigation is complete and approved or for the time 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**

R #	Time	VRF		Violat	ion Severity Levels	
	Horizon		Lower VSL	Moderate VSL	High VSL	Severe VSL
R1	Same-Day Operations, Real-time Operations	High	N/A	N/A	N/A	The Reliability Coordinator failed to act to address the reliability of its Reliability Coordinator Area via direct actions or by issuing Operating Instructions.
R2	Same-Day Operations, Real-time Operations	High	N/A	N/A	N/A	The responsible entity did not comply with the Reliability Coordinator's Operating Instructions, and compliance with the Operating Instructions could have been physically implemented and such actions would not have violated safety, equipment, regulatory, or statutory requirements.
R3	Same-Day Operations, Real-time Operations	High	N/A	N/A	N/A	The responsible entity failed to inform its Reliability Coordinator upon recognition of its inability to perform an Operating Instruction issued by its Reliability Coordinator in Requirement R1.

# **D. Regional Variances**

None.

# **E.** Interpretations

None.

# **F.** Associated Documents

None.

# **Version History**

Version	Date	Action	Change Tracking
0	April 1, 2005	Effective Date	New
0	August 8, 2005	Removed "Proposed" from Effective Date	Errata
1	November 1, 2006	Adopted by Board of Trustees	Revised
1	November 19, 2006	Changes "Distribution Provider" to "Transmission Service provider"	Errata
1	April 4, 2007	Approved by FERC – Effective Date	New
1.1	October 29, 2008	Removed "proposed" from effective date	Errata
		BOT adopted errata changes: updated version number to "1.1"	
1.1	May 13, 2009	FERC Approval	Revised
1	May 19, 2011	Replaced Levels of Noncompliance with FERC-approved VSLs	VSL Order
2	July 25, 2011	Revisions under Project 2006-06 to remove Requirement R7 to avoid duplication with IRO-014-2	Revised
2	August 4, 2011	Adopted by Board of Trustees	
3	July 6, 2012	Revised in accordance with SAR for Project 2006-06, Reliability Coordination (RC SDT). Revised the standard and retired six requirements (R1, R2, R4, R5, R6, and R9).	Revised

# Standard IRO-001-4 Reliability Coordination - Responsibilities

		Requirement R3 becomes the new R1 and R8 becomes the new R2 and R3.	
3	August 16, 2012	Adopted by Board of Trustees	Revised
4	November 13, 2014	Adopted by Board of Trustees	Revisions under Project 2014-03

### **Guidelines and Technical Basis**

#### Rationale:

During development of this standard, text boxes were embedded within the standard to explain the rationale for various parts of the standard. Upon BOT approval, the text from the rationale text boxes was moved to this section.

#### **Rationale for Applicability:**

Purchasing-Selling Entity and Load-Serving Entity have been deleted from the approved IRO-001-1.1 as they are not listed as entities that the Reliability Coordinator directs in Functional Model v5.

### **Rationale for Change from Reliability Directive to Operating Instruction:**

The change from Reliability Directive to Operating Instruction throughout the standard is in response to NOPR paragraph 64 (..." We believe that directives from a reliability coordinator or transmission operator should be mandatory at all times, and not just during emergencies (unless contrary to safety, equipment, regulatory or statutory requirements). For example, mandatory compliance with directives in non-emergency situations is important when a decision is made to alter or maintain the state of an element on the interconnected transmission network...") This change is also consistent with the proposed COM-002-4.

#### Rationale for Requirements R2 and R3:

The Transmission Service Provider has been removed from Requirements R2 and R3 as the Transmission Service Provider is not listed in the Functional Model as a recipient of corrective actions issued by the Reliability Coordinator. This allows for the retirement of IRO-004-2.

# Reliability Standard IRO-002-4

### A. Introduction

1. Title: Reliability Coordination – Monitoring and Analysis

**2.** Number: IRO-002-4

**3. Purpose:** Provide System Operators with the capabilities necessary to monitor and analyze data needed to perform their reliability functions.

#### 4. Applicability

**4.1.** Reliability Coordinator

#### 5. Effective Date:

See Implementation Plan.

6. Background:

See the Project 2014-03 project page.

# **B.** Requirements and Measures

- **R1.** Each Reliability Coordinator shall have data exchange capabilities with its Balancing Authorities and Transmission Operators, and with other entities it deems necessary, for it to perform its Operational Planning Analyses, Real-time monitoring, and Real-time Assessments. [Violation Risk Factor: High] [Time Horizon: Operations Planning, Same-Day Operations, Real-time Operations]
- M1. Each Reliability Coordinator shall have and provide upon request, evidence that could include but is not limited to a document that lists its data exchange capabilities with its Balancing Authorities and Transmission Operators, and with other entities it deems necessary, for it to perform its operational Planning Analyses, Real-time monitoring, and Real-time Assessments.
- **R2.** Each Reliability Coordinator shall provide its System Operators with the authority to approve planned outages and maintenance of its telecommunication, monitoring and analysis capabilities. [Violation Risk Factor: High] [Time Horizon: Operations Planning, Same-Day Operations, Real-time Operations]
- **M2.** Each Reliability Coordinator shall have and provide upon request evidence that could include but is not limited to a documented procedure or equivalent evidence that will be used to confirm that the Reliability Coordinator has provided its System Operators with the authority to approve planned outages and maintenance of its telecommunication, monitoring and analysis capabilities.
- **R3.** Each Reliability Coordinator shall monitor Facilities, the status of Special Protection Systems, and non-BES facilities identified as necessary by the Reliability Coordinator, within its Reliability Coordinator Area and neighboring Reliability Coordinator Areas to identify any System Operating Limit exceedances and to determine any

- Interconnection Reliability Operating Limit exceedances within its Reliability Coordinator Area. [Violation Risk Factor: High] [Time Horizon: Real-Time Operations]
- M3. Each Reliability Coordinator shall have, and provide upon request, evidence that could include but is not limited to Energy Management System description documents, computer printouts, SCADA data collection, or other equivalent evidence that will be used to confirm that it has monitored Facilities, the status of Special Protection Systems, and non-BES facilities identified as necessary by the Reliability Coordinator, within its Reliability Coordinator Area and neighboring Reliability Coordinator Areas to identify any System Operating Limit exceedances and to determine any Interconnection Reliability Operating Limit exceedances within its Reliability Coordinator Area.
- **R4.** Each Reliability Coordinator shall have monitoring systems that provide information utilized by the Reliability Coordinator's operating personnel, giving particular emphasis to alarm management and awareness systems, automated data transfers, and synchronized information systems, over a redundant infrastructure. [Violation Risk Factor: High] [Time Horizon: Real-time Operations]
- **M4.** The Reliability Coordinator shall have, and provide upon request, evidence that could include but is not limited to Energy Management System description documents, computer printouts, SCADA data collection, or other equivalent evidence that will be used to confirm that it has monitoring systems consistent with the requirement.

# 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 Assessment Processes:

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 Reliability Coordinator shall keep data or evidence to show compliance as identified below unless directed by its Compliance Enforcement Authority to retain specific evidence for a longer period of time as part of an investigation:

The Reliability Coordinator shall retain its current, in force document and any documents in force for the current year and previous calendar year for Requirements R1, R2, and R3 and Measures M1, M2, and M3.

The Reliability Coordinator shall keep data or evidence for Requirement R4 and Measure M4 for the current calendar year and one previous calendar year.

If a Reliability Coordinator is found non-compliant, it shall keep information related to the non-compliance until found compliant.

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**

R #	Time Horizon	VRF		Violati	on Severity Levels	
			Lower VSL	Moderate VSL	High VSL	Severe VSL
R1	Operations Planning, Same-Day Operations, Real-time Operations	High	The Reliability Coordinator did not have data exchange capabilities with one applicable entity, or 5% or less of the applicable entities, whichever is greater.	The Reliability Coordinator did not have data exchange capabilities with two applicable entities, or more than 5% or less than or equal to 10% of the applicable entities, whichever is greater.	The Reliability Coordinator did not have data exchange capabilities with three applicable entities, or more than 10% or less than or equal to 15% of the applicable entities, whichever is greater.	The Reliability Coordinator did not have data exchange capabilities with four or more applicable entities or greater than 15% of the applicable entities, whichever is greater.
R2	Operations Planning, Same-Day Operations, Real-time Operations	High	N/A	N/A	N/A	The Reliability Coordinator failed to provide its System Operator with the authority to approve planned outages and maintenance of its telecommunication, monitoring and analysis capabilities.
R3	Real-time Operations	High	N/A	N/A	N/A	The Reliability Coordinator did not monitor Facilities, the status of Special Protection Systems, and non-BES facilities identified as necessary by the Reliability Coordinator, within its Reliability Coordinator Area and neighboring Reliability Coordinator Areas to identify any System Operating Limit exceedances and to determine any Interconnection Reliability

R #	Time Horizon	VRF	Violation Severity Levels				
			Lower VSL	Moderate VSL	High VSL	Severe VSL	
						Operating Limit exceedances within its Reliability Coordinator Area.	
R4	Operations Planning, Same-Day Operations, Real-time Operations	High	N/A	N/A	N/A	The Reliability Coordinator did not have monitoring systems that provide information utilized by the Reliability Coordinator's operating personnel, giving particular emphasis to alarm management and awareness systems, automated data transfers, and synchronized information systems, over a redundant infrastructure.	

# **D. Regional Variances**

None.

# **E.** Interpretations

None.

# **F.** Associated Documents

None.

# **Version History**

Version	Date	Action	Change Tracking
0	April 1, 2005	Effective Date	New
0	August 8, 2005	Removed "Proposed" from Effective Date	Errata
1	November 1, 2006	Adopted by Board of Trustees	Revised
1	April 4, 2007	Replaced Levels of Non-compliance with the Feb 28, BOT approved Violation Severity Levels (VSLs) Corrected typographical errors in BOT approved version of VSLs	Revised to add missing measures and compliance elements
2	October 17, 2008	Adopted by NERC Board of Trustees	Deleted R2, M3 and associated compliance elements as conforming changes associated with approval of IRO-010-1. Revised as part of IROL Project
2	March 17, 2011	Order issued by FERC approving IRO-002-2 (approval effective 5/23/11)	FERC approval
2	February 24, 2014	Updated VSLs based on June 24, 2013 approval.	VSLs revised
3	July 25, 2011	Revised under Project 2006-06	Revised
3	August 4, 2011	Approved by Board of Trustees	Retired R1-R8 under Project 2006-06.

# Standard IRO-002-4 — Reliability Coordination — Monitoring and Analysis

4	November 13, 2014	Approved by Board of Trustees	Revisions under
			Project 2014-03

#### **Guidelines and Technical Basis**

#### Rationale:

During development of this standard, text boxes were embedded within the standard to explain the rationale for various parts of the standard. Upon BOT approval, the text from the rationale text boxes was moved to this section.

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.

#### **Rationale for Requirements:**

The data exchange elements of Requirements R1 and R2 from approved IRO-002-2 have been added back into proposed IRO-002-4 in order to ensure that there is no reliability gap. The SDT found no proposed requirements in the current project that covered the issue. Voice communication is covered in proposed COM-001-2 but data communications needs to remain in IRO-002-4 as it is not covered in proposed COM-001-2. Staffing of communications and facilities in corresponding requirements from IRO-002-2 is addressed in approved PER-004-2, Requirement R1 and has been deleted from this draft.

#### **Rationale for R2:**

Requirement R2 from IRO-002-3 has been deleted because approved EOP-008-1, Requirement R1, part 1.6.2 addresses redundancy and back-up concerns for outages of analysis tools. New Requirement R4 has been added to address NOPR paragraphs 96 and 97: "...As we explain above, the reliability coordinator's obligation to monitor SOLs is important to reliability because a SOL can evolve into an IROL during deteriorating system conditions, and for potential system conditions such as this, the reliability coordinator's monitoring of SOLs provides a necessary backup function to the transmission operator...."

#### **Rationale for R4:**

Requirement R4 added back from approved IRO-002-2 as the SDT found no proposed requirements that covered the issues.

# Reliability Standard IRO-008-2

#### 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:

See Implementation Plan.

6. Background

See Project 2014-03 project page.

## **B.** Requirements and Measures

- 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) and Interconnection Operating Reliability Limits (IROLs) within its 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.
- R2. 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 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]
- M2. 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 while considering 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.

- **R3.** Each Reliability Coordinator shall notify impacted entities identified in its Operating Plan(s) cited in Requirement R2 as to their role in such plan(s). [Violation Risk Factor: Medium] [Time Horizon: Operations Planning]
- **M3.** Each Reliability Coordinator shall have evidence that it notified impacted entities identified in its Operating Plan(s) cited in Requirement R2 as to their role in such plan(s). Such evidence could include but is not limited to dated operator logs, or email records.
- **R4.** Each Reliability Coordinator shall ensure that a Real-time Assessment is performed at least once every 30 minutes. [Violation Risk Factor: High] [Time Horizon: Sameday Operations, Real-time Operations]
- **M4.** Each Reliability Coordinator shall have, and make available upon request, evidence to show it ensured that a Real-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.
- R5. 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 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 Wide Area. [Violation Risk Factor: High] [Time Horizon: Same-Day Operations, Real-time Operations]
- M5. 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 within its Wide Area. 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.
- 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 System Operating Limit (SOL) or Interconnection Reliability Operating Limit (IROL) exceedance identified in Requirement R5 has been prevented or mitigated. [Violation Risk Factor: Medium] [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, when the System Operating Limit (SOL) or Interconnection Reliability Operating Limit (IROL) exceedance identified in Requirement R5 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 Assessment Processes

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 R3, R5, and R6 and Measures M1 through M3, M5, and M6 for a rolling 90-calendar days period for analyses, the most recent 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 R4 and Measure M4 for 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**

	<b>*</b> ***********************************	VRF		Viol	ation Severity Leve	ls
R#	Time Horizons		Lower VSL	Moderate VSL	High VSL	Severe VSL
R1	Operations Planning	Medium	N/A	N/A	N/A	The Reliability Coordinator did not perform an Operational Planning Analysis allowing it to assess whether its planned operations for the next-day within its Wide Area will exceed any of its System Operating Limits (SOLs) and Interconnection Operating Reliability Limits (IROLs).
R2	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 of its Operational Planning Analysis as performed in Requirement R1 while considering the Operating Plans for the next-day provided by its Transmission Operators and Balancing Authorities.

	Time Herizone	ne Horizons VRF		Violation Severity Levels						
R#	Time Horizons	VKF	Lower VSL	Moderate VSL	High VSL	Severe VSL				
find th	For the Requirement R3 and R5 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									
R3	Operations Planning	Medium	The Reliability Coordinator did not notify one impacted entity or 5% or less of the impacted entities whichever is greater identified in its Operating Plan(s) as to their role in that plan(s).	The Reliability Coordinator did not notify two impacted entities or more than 5% and less than or equal to 10% of the impacted entities whichever is greater, identified in its Operating Plan(s) as to their role in that plan(s).	The Reliability Coordinator did not notify three impacted entities or more than 10% and less than or equal to 15% of the impacted entities whichever is greater, identified in its Operating Plan(s) as to their role in that plan(s).	The Reliability Coordinator did not notify four or more impacted entities or more than 15% of the impacted entities identified in its Operating Plan(s) as to their role in that plan(s).				
R4	Same-day Operations, Real-time Operations	High	For any sample 24-hour period within the 30- day retention period, the Reliability	For any sample 24-hour period within the 30-day retention period, the Reliability Coordinator's	For any sample 24-hour period within the 30- day retention period, the Reliability	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				

	Time Herican	vo VDF	Violation Severity Levels				
R#	Time Horizons	VRF	Lower VSL	Moderate VSL	High VSL	Severe VSL	
			Coordinator's Real-time Assessment was not conducted for one 30- minute period within that 24- hour period.	Real-time Assessment was not conducted for two 30-minute periods within that 24-hour period.	Coordinator's Real-time Assessment was not conducted for three 30- minute periods within that 24- hour period.	within that 24-hour period.	
R5	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	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	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	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	

	Time Headers	VDE		Viol	ation Severity Leve	ls
R#	Time Horizons	VRF	Lower VSL	Moderate VSL	High VSL	Severe VSL
			Reliability Coordinator Area whichever is greater, 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 Wide Area.	its Reliability Coordinator Area whichever is greater, 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 Wide Area.	Balancing Authorities within its Reliability Coordinator Area whichever is greater, 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 Wide Area.	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 Wide Area.

	<b>-</b> :	V0=		Viol	ation Severity Leve	els
R#	Time Horizons	VRF	Lower VSL	Moderate VSL	High VSL	Severe VSL
R6	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 is greater, when the System Operating Limit (SOL) or Interconnection Reliability	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 greater, when the System Operating Limit (SOL) or Interconnection Reliability Operating Limit	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 Reliability Coordinator Area whichever is greater, when the System Operating Limit	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 R5 was 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 Reliability Operating Limit (IROL) exceedance identified in Requirement R5 was prevented or mitigated.

	Time Horizons	VRF	Violation Severity Levels			
R#			Lower VSL	Moderate VSL	High VSL	Severe VSL
			Operating Limit (IROL) exceedance identified in Requirement R5 was prevented or mitigated.  OR The Reliability Coordinator did not notify one other impacted Reliability Coordinator as indicated in its Operating Plan when the when the System Operating Limit (SOL) or Interconnection Reliability Operating Limit (IROL) exceedance identified in	(IROL) exceedance identified in Requirement R6 was prevented or mitigated.  OR The Reliability Coordinator did not notify two 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 R5 was prevented or	(SOL) or Interconnection Reliability Operating Limit (IROL) exceedance identified in Requirement R5 was prevented or mitigated.  OR  The Reliability Coordinator did not notify three other impacted Reliability Coordinators as indicated in its Operating Plan when the System Operating Limit (SOL) or Interconnection Reliability Operating Limit	

R#	Time Horizons	VRF	Violation Severity Levels				
			Lower VSL	Moderate VSL	High VSL	Severe VSL	
			Requirement R5 was prevented or mitigated.	mitigated.	(IROL) exceedance identified in Requirement R5 was prevented or mitigated.		

## D. Regional Variances

None

## E. Interpretations

None

#### F. Associated Documents

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.

# **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	November 13, 2014	Adopted by NERC Board of Trustees	Revisions under Project 2014-03

#### **Guidelines and Technical Basis**

#### Rationale:

During development of this standard, text boxes were embedded within the standard to explain the rationale for various parts of the standard. Upon BOT approval, the text from the rationale text boxes was moved to this section.

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.

#### Rationale for 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.

#### Rationale for R2 and R3:

Requirements added in response to IERP and SW Outage Report recommendations concerning the coordination and review of plans.

#### Rationale for R5 and R6:

In Requirements R5 and R6 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.

# Reliability Standard IRO-010-2

#### A. Introduction

1. Title: Reliability Coordinator Data Specification and Collection

**2. Number:** IRO-010-2

**3. Purpose:** To prevent instability, uncontrolled separation, or Cascading outages that adversely impact reliability, by ensuring the Reliability Coordinator has the data it needs to monitor and assess the operation of its Reliability Coordinator Area.

### 4. Applicability

- **4.1.** Reliability Coordinator.
- **4.2.** Balancing Authority.
- 4.3. Generator Owner.
- **4.4.** Generator Operator.
- **4.5.** Load-Serving Entity.
- **4.6.** Transmission Operator.
- 4.7. Transmission Owner.
- 4.8. Distribution Provider.

#### 5. Proposed Effective Date:

See Implementation Plan.

#### 6. Background

See Project 2014-03 project page.

### **B.** Requirements

- **R1.** The Reliability Coordinator shall maintain a documented specification for the data necessary for it to perform its Operational Planning Analyses, Real-time monitoring, and Real-time Assessments. The data specification shall include but not be limited to: (Violation Risk Factor: Low) (Time Horizon: Operations Planning)
  - 1.1. A list of data and information needed by the Reliability Coordinator to support its Operational Planning Analyses, Real-time monitoring, and Real-time Assessments including non-BES data and external network data, as deemed necessary by the Reliability Coordinator.
  - **1.2.** Provisions for notification of current Protection System and Special Protection System status or degradation that impacts System reliability.
  - **1.3.** A periodicity for providing data.
  - **1.4.** The deadline by which the respondent is to provide the indicated data.

- **M1.** The Reliability Coordinator shall make available its dated, current, in force documented specification for data.
- **R2.** The Reliability Coordinator shall distribute its data specification to entities that have data required by the Reliability Coordinator's Operational Planning Analyses, Real-time monitoring, and Real-time Assessments. (Violation Risk Factor: Low) (Time Horizon: Operations Planning)
- **M2.** The Reliability Coordinator shall make available evidence that it has distributed its data specification to entities that have data required by the Reliability Coordinator's Operational Planning Analyses, Real-time monitoring, and Real-time Assessments. This evidence could include but is not limited to web postings with an electronic notice of the posting, dated operator logs, voice recordings, postal receipts showing the recipient, date and contents, or e-mail records.
- **R3.** Each Reliability Coordinator, Balancing Authority, Generator Owner, Generator Operator, Load-Serving Entity, Transmission Operator, Transmission Owner, and Distribution Provider receiving a data specification in Requirement R2 shall satisfy the obligations of the documented specifications using: (Violation Risk Factor: Medium) (Time Horizon: Operations Planning, Same-Day Operations, Real-time Operations)
  - **3.1** A mutually agreeable format
  - 3.2 A mutually agreeable process for resolving data conflicts
  - **3.3** A mutually agreeable security protocol
- M3. The Reliability Coordinator, Balancing Authority, Generator Owner, Generator Operator, Load-Serving Entity, Reliability Coordinator, Transmission Operator, Transmission Owner, and Distribution Provider receiving a data specification in Requirement R2 shall make available evidence that it satisfied the obligations of the documented specification using the specified criteria. Such evidence could include but is not limited to electronic or hard copies of data transmittals or attestations of receiving entities.

### 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 Assessment Processes

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 Reliability Coordinator, Balancing Authority, Generator Owner, Generator Operator, Load-Serving Entity, Transmission Operator, Transmission Owner, and Distribution Provider shall each keep data or evidence to show compliance as identified below unless directed by its Compliance Enforcement Authority to retain specific evidence for a longer period of time as part of an investigation:

The Reliability Coordinator shall retain its dated, current, in force documented specification for the data necessary for it to perform its Operational Planning Analyses, Real-time monitoring, and Real-time Assessments for Requirement R1, Measure M1 as well as any documents in force since the last compliance audit.

The Reliability Coordinator shall keep evidence for three calendar years that it has distributed its data specification to entities that have data required by the Reliability Coordinator's Operational Planning Analyses, Real-time monitoring, and Real-time Assessments for Requirement R2, Measure M2.

Each Reliability Coordinator, Balancing Authority, Generator Owner, Generator Operator, Interchange Authority, Load-Serving Entity, Transmission Operator, Transmission Owner, and Distribution Provider receiving a data specification shall retain evidence for the most recent 90-calendar days that it has satisfied the obligations of the documented specifications in accordance with Requirement R3 and Measurement M3.

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**

R#	Time	VRF		Violation Seve	rity Levels	
	Horizon		Lower	Moderate	High	Severe
R1	Operations Planning	Low	The Reliability Coordinator did not include one of the parts (Part 1.1 through Part 1.4) of the documented specification for the data necessary for it to perform its Operational Planning Analyses, Real-time monitoring, and Real-time Assessments.	The Reliability Coordinator did not include two of the parts (Part 1.1 through Part 1.4) of the documented specification for the data necessary for it to perform its Operational Planning Analyses, Real-time monitoring, and Real-time Assessments.	The Reliability Coordinator did not include three of the parts (Part 1.1 through Part 1.4) of the documented specification for the data necessary for it to perform its Operational Planning Analyses, Real-time monitoring, and Real-time Assessments.	The Reliability Coordinator did not include any of the parts (Part 1.1 through Part 1.4) of the documented specification for the data necessary for it to perform its Operational Planning Analyses, Real-time monitoring, and Real-time Assessments.  OR,
					Assessments.	The Reliability Coordinator did not have a documented specification for the data necessary for it to perform its Operational Planning Analyses, Real-time

R#	Time	VRF		Violation Seve	rity Levels	
	Horizon		Lower	Moderate	High	Severe
						monitoring, and Real-time Assessments.
left u	ntil you find the	e situation that	the intent of the SDT is to fits. In this manner, the Norm, the intent is that	/SL will not be discrimina	atory by size of entity.	•
R2	Operations Planning	Low	The Reliability Coordinator did not distribute its data specification as developed in Requirement R1 to one entity, or 5% or less of the entities, whichever is greater, that have data required by the Reliability Coordinator's Operational Planning Analyses, Real-time monitoring, and Real- time Assessments.	The Reliability Coordinator did not distribute its data specification as developed in Requirement R1 to two entities, or more than 5% and less than or equal to 10% of the reliability entities, whichever is greater, that have data required by the Reliability Coordinator's Operational Planning Analyses, and Real- time monitoring, and	The Reliability Coordinator did not distribute its data specification as developed in Requirement R1 to three entities, or more than 10% and less than or equal to 15% of the reliability entities, whichever is greater, that have data required by the Reliability Coordinator's Operational Planning Analyses,	The Reliability Coordinator did not distribute its data specification as developed in Requirement R1 to four or more entities, or more than 15% of the entities, whichever is greater, that have data required by the Reliability Coordinator's Operational Planning Analyses, Real-time monitoring, and

R#	Time	VRF	Violation Severity Levels					
	Horizon		Lower	Moderate	High	Severe		
				Assessments.	monitoring, and Real-time Assessments.	Assessments.		
R3	Operations Planning, Same-Day Operations, Real-time Operations	Medium	The responsible entity receiving a data specification in Requirement R2 satisfied the obligations of the documented specifications for data but failed to follow one of the criteria shown in Parts 3.1 – 3.3.	The responsible entity receiving a data specification in Requirement R2 satisfied the obligations of the documented specifications for data but failed to follow two of the criteria shown in Parts 3.1 – 3.3.	The responsible entity receiving a data specification in Requirement R2 satisfied the obligations of the documented specifications for data but failed to follow any of the criteria shown in Parts 3.1 – 3.3.	The responsible entity receiving a data specification in Requirement R2 did not satisfy the obligations of the documented specifications for data.		

**D. Regional Variances** 

None

**E.** Interpretations

None

**F. Associated Documents** 

None

# **Version History**

Version	Date	Action	Change Tracking
1	October 17, 2008	Adopted by Board of Trustees	New
1a	August 5, 2009	Added Appendix 1: Interpretation of R1.2 and R3 as approved by Board of Trustees	Addition
1a	March 17, 2011	Order issued by FERC approving IRO- 010-1a (approval effective 5/23/11)	
1a	November 19, 2013	Updated VRFs based on June 24, 2013 approval	
2	April 2014	Revisions pursuant to Project 2014-03	
2	November 13, 2014	Adopted by NERC Board of Trustees	Revisions under Project 2014-03

### **Guidelines and Technical Basis**

#### Rationale:

During development of this standard, text boxes were embedded within the standard to explain the rationale for various parts of the standard. Upon BOT adoption, the text from the rationale text boxes was moved to this section.

#### Rationale for Definitions:

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.

## **Rationale for Applicability Changes:**

Changes were made to applicability based on IRO FYRT recommendation to address the need for UVLS and UFLS information in the data specification.

The Interchange Authority was removed because activities in the Coordinate Interchange standards are performed by software systems and not a responsible entity. The software, not a functional entity, performs the task of accepting and disseminating interchange data between entities. The Balancing Authority is the responsible functional entity for these tasks.

The Planning Coordinator and Transmission Planner were removed from Draft 2 as those entities would not be involved in a data specification concept as outlined in this standard.

### Rationale:

### Proposed Requirement R1, Part 1.1:

Is in response to issues raised in NOPR paragraph 67 on the need for obtaining non-BES and external network data necessary for the Reliability Coordinator to fulfill its responsibilities.

### Proposed Requirement R1, Part 1.2:

Is in response to NOPR paragraph 78 on relay data.

### Proposed Requirement R3, Part 3.3:

## Standard IRO-010-2 — Guidelines and Technical Basis

Is in response to NOPR paragraph 92 where concerns were raised about data exchange through secured networks.

Corresponding changes have been made to proposed TOP-003-3.

## Reliability Standard IRO-014-3

### A. Introduction

1. Title: Coordination Among Reliability Coordinators

**2. Number:** IRO-014-3

**3. Purpose:** To ensure that each Reliability Coordinator's operations are coordinated such that they will not adversely impact other Reliability Coordinator Areas and to preserve the reliability benefits of interconnected operations.

### 4. Applicability:

**4.1.** Reliability Coordinator

### 5. Effective Date

See Implementation Plan.

6. Background:

See Project 2014-03 project page.

## **B.** Requirements and Measures

- R1. Each Reliability Coordinator shall have and implement Operating Procedures, Operating Processes, or Operating Plans, for activities that require notification or coordination of actions that may impact adjacent Reliability Coordinator Areas, to support Interconnection reliability. These Operating Procedures, Operating Processes, or Operating Plans shall include, but are not limited to, the following: [Violation Risk Factor: Medium] [Time Horizon: Operations Planning, Same-Day Operations]
  - **1.1.** Criteria and processes for notifications.
  - **1.2.** Energy and capacity shortages.
  - **1.3.** Control of voltage, including the coordination of reactive resources.
  - **1.4.** Exchange of information including planned and unplanned outage information to support its Operational Planning Analyses and Real-time Assessments.
  - **1.5.** Provisions for periodic communications to support reliable operations.
- M1. Each Reliability Coordinator shall have available the latest approved documented version of its Operating Procedures, Operating Processes, and Operating Plans that require notifications, or the coordination of actions among impacted Reliability Coordinators for conditions or activities that may impact adjacent Reliability Coordinator Areas. This documentation shall include dated, current in force documentation with the specified elements, and notes from periodic communications.
- **R2.** Each Reliability Coordinator shall maintain its Operating Procedures, Operating Processes, or Operating Plans identified in Requirement R1 as follows: [Violation Risk Factor: Low] [Time Horizon: Operations Planning, Same-Day Operations]

- **2.1.** Review and update annually with no more than 15 months between reviews.
- **2.2.** Obtain written agreement from all of the Reliability Coordinators required to take the indicated action(s) for each update.
- **2.3.** Distribute to all Reliability Coordinators that are required to take the indicated action(s) within 30 days of an update.
- M2. Each Reliability Coordinator shall have dated evidence that its Operating Procedures, Operating Processes, and Operating Plans that require one or more other Reliability Coordinators to take action were maintained as specified. This evidence may include but is not limited to dated documentation with confirmation of receipt, dated notice of acceptance or agreement to take specified actions, or dated electronic communications with confirmation of receipt and acceptance or agreement to take specified actions.
- R3. Each Reliability Coordinator, upon identification of an expected or actual Emergency in its Reliability Coordinator Area, shall notify other impacted Reliability Coordinators. [Violation Risk Factor: Medium] [Time Horizon: Operations Planning, Same Day Operations, Real-time Operations]
- **M3.** Each Reliability Coordinator shall have and provide evidence which may include but is not limited to operator logs, voice recordings, or transcripts of voice recordings, electronic communications, or equivalent dated documentation, that will be used to determine that it, upon identification of an expected or actual Emergency in its Reliability Coordinator Area, notified other impacted Reliability Coordinators.
- **R4.** Each impacted Reliability Coordinator shall operate as though the Emergency exists during each instance where Reliability Coordinators disagree on the existence of an Emergency. [Violation Risk Factor: High] [Time Horizon: Operations Planning, Same-Day Operations, Real-time Operations]
- **M4.** Each Reliability Coordinator shall have and provide evidence which may include but is not limited to operator logs, voice recordings or transcripts of voice recordings, electronic communications, or equivalent documentation, that will be used to determine that it operated as though an Emergency existed during each instance where Reliability Coordinators disagreed on the existence of an Emergency.
- R5. Each Reliability Coordinator that Identifies an Emergency in its Reliability Coordinator Area shall develop an action plan to resolve the Emergency during those instances where impacted Reliability Coordinators disagree on the existence of an Emergency. [Violation Risk Factor: High][Time Horizon: Operations Planning, Same-Day Operations, Real-time Operations]
- **M5.** Each Reliability Coordinator that identifies an Emergency in its Reliability Coordinator Area shall have evidence that it developed an action plan during those instances where impacted Reliability Coordinators disagreed on the existence of an Emergency. This evidence may include but is not limited to operator logs, voice recordings or

- transcripts of voice recordings, electronic communications, or equivalent dated documentation.
- R6. Each impacted Reliability Coordinator shall implement the action plan developed by the Reliability Coordinator that identifies the Emergency during those instances where Reliability Coordinators disagree on the existence of an Emergency, unless such actions would violate safety, equipment, regulatory, or statutory requirements. [Violation Risk Factor: High][Time Horizon: Operations Planning, Same-Day Operations, Real-time Operations]
- M6. Each impacted Reliability Coordinator shall have and provide evidence which may include but is not limited to operator logs, voice recordings or transcripts of voice recordings, electronic communications, or equivalent dated documentation, that will be used to determine that it implemented the action plan developed by the Reliability Coordinator who identifies the Emergency when Reliability Coordinators disagree on the existence of an Emergency unless such actions would have violated safety, equipment, regulatory, or statutory requirements.
- **R7**. Each Reliability Coordinator shall assist Reliability Coordinators, if requested and able, provided that the requesting Reliability Coordinator has implemented its emergency procedures, unless such actions cannot be physically implemented or would violate safety, equipment, regulatory, or statutory requirements. [Violation Risk Factor: High] [Time Horizon: Real-time Operations]
- M7. Each Reliability Coordinator shall make available upon request, evidence that requested assistance was provided, if able, to requesting Reliability Coordinators unless such actions could not be physically implemented or would violate safety, equipment, regulatory, or statutory requirements. 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 in electronic or hard copy format. 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 Assessment Processes:

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 Reliability Coordinator shall keep data or evidence to show compliance as identified below 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 retain its current, in force document and any documents in force since the last compliance audit for Requirements R1 and R2 and Measures M1 and M2.
- Each Reliability Coordinator shall retain its most recent 12 months of evidence for Requirement R5 and Measure M5.
- Each Reliability Coordinator shall retain 3-calendar years plus current calendar year of evidence for Requirement R6 and Measure M6.
- Each Reliability Coordinator shall retain evidence for 90-calendar days for operator logs and voice recordings and for the period since the last compliance audit for other evidence for Requirements R3, R4, and R7 and Measures M3, M4, and M7.

If a Reliability Coordinator is found non-compliant, it shall keep information related to the non-compliance until found compliant, or for 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**

R #	Time Horizon	VRF		Violation Se	verity Levels	
			Lower VSL	Moderate VSL	High VSL	Severe VSL
R1	Operations Planning, Same-Day Operations	Medium	The Reliability Coordinator has Operating Procedures, Operating Processes, or Operating Plans in place for activities that require notification or coordination of actions with impacted adjacent Reliability Coordinators to support Interconnection reliability but failed to address one of the topical areas identified in Parts 1.1 through 1.5.	The Reliability Coordinator has Operating Procedures, Operating Processes, or Operating Plans in place for activities that require notification, or coordination of actions with impacted adjacent Reliability Coordinators to support Interconnection reliability but failed to address two of the topical areas identified in Parts 1.1 through 1.5.	The Reliability Coordinator has Operating Procedures, Operating Processes, or Operating Plans in place for activities that require notification, or coordination of actions with impacted adjacent Reliability Coordinators to support Interconnection reliability but failed to address three of the topical areas identified in Parts 1.1 through 1.5.	The Reliability Coordinator failed to have Operating Procedures, Operating Processes, or Operating Plans in place for activities that require notification, or coordination of actions with impacted adjacent Reliability Coordinators to support Interconnection reliability.  OR, The Reliability Coordinator failed to implement its Operating Procedures, Operating Procedures, Operating Plans when activities required notification, or coordination of actions with impacted adjacent Reliability Coordinators to support

R #	Time Horizon	VRF		Violation Se	everity Levels		
			Lower VSL	Moderate VSL	High VSL	Severe VSL	
						Interconnection reliability.	
R2	Operations Planning, Same-Day Operations	Lower	N/A the intent of the SDT is to s	The Reliability Coordinator has Operating Procedures, Operating Processes, or Operating Plans identified in Requirement R1 but failed to address one of the parts specified in Requirement R2.	The Reliability Coordinator has Operating Procedures, Operating Processes, or Operating Plans identified in Requirement R1 but failed to address two of the parts specified in Requirement R2.	The Reliability Coordinator has Operating Procedures, Operating Processes, or Operating Plans identified in Requirement R1 but failed to address all three of the parts specified in Requirement R2.	
the site	uation that fits.	In this manı	ner, the VSL will not be disc that situation would be a Se	riminatory by size. If a Relia	•	•	
R3	Operations Planning, Same-Day Operations, Real-time Operations	Medium	The Reliability Coordinator did not notify one other impacted Reliability Coordinator upon identification of an expected or actual Emergency in its Reliability Coordinator Area.	The Reliability Coordinator did not notify two other impacted Reliability Coordinators upon identification of an expected or actual Emergency in its Reliability Coordinator Area.	The Reliability Coordinator did not notify three other impacted Reliability Coordinators upon identification of an expected or actual Emergency in its Reliability Coordinator Area.	The Reliability Coordinator did not notify four or more other impacted Reliability Coordinators upon identification of an expected or actual Emergency in its Reliability Coordinator Area.	

R #	Time Horizon	VRF		Violation Se	everity Levels	
			Lower VSL	Moderate VSL	High VSL	Severe VSL
R4	Operations Planning, Same-Day Operations, Real-time Operations	High	N/A	N/A	N/A	The Reliability Coordinator failed to operate as though the Emergency existed during an instance where Reliability Coordinators disagreed on the existence of an Emergency.
R5	Operations Planning, Same-Day Operations, Real-time Operations	High	N/A	N/A	N/A	The Reliability Coordinator that identifies the Emergency in its Reliability Coordinator Area failed to develop an action plan to resolve the Emergency during an instance where impacted Reliability Coordinators disagreed on the existence of Emergency.
R6	Real-time Operations, Same-Day Operations	High	N/A	N/A	N/A	The impacted Reliability Coordinator failed to implement the action plan developed by the Reliability Coordinator that identifies the

R #	Time Horizon	VRF		Violation Se	verity Levels	
			Lower VSL	Moderate VSL	High VSL	Severe VSL
						Emergency during an instance where Reliability Coordinators disagreed on the existence of the Emergency.
R7	Real-time Operations	High	N/A	N/A	N/A	The Reliability Coordinator did not provide assistance to Reliability Coordinators, if requested and able, provided that the requesting Reliability Coordinator had implemented its emergency procedures, unless such actions could not physically be implemented or would have violated safety, equipment, regulatory, or statutory requirements.

## D. Regional Variances

None.

## E. Interpretations

None.

### F. Associated Documents

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.

# **Version History**

Version	Date	Action	Change Tracking
1	August 10, 2005	<ol> <li>Changed incorrect use of certain hyphens (-) to "en dash (-)."</li> <li>Hyphenated "30-day" when used as adjective.</li> <li>Changed standard header to be consistent with standard "Title."</li> <li>Initial capped heading "Definitions of Terms Used in Standard."</li> <li>Added "periods" to items where appropriate.</li> <li>Changed "Timeframe" to "Time Frame" in item D, 1.2.</li> <li>Lower cased all words that are not "defined" terms — drafting team, self-certification.</li> <li>Changed apostrophes to "smart" symbols.</li> <li>Added comma in all word strings "Procedures, Processes, or Plans," etc.</li> <li>Added hyphens to "Reliability Coordinator-to-Reliability Coordinator" where used as adjective.</li> <li>Removed comma in item 2.1.2.</li> <li>Removed extra spaces between words where appropriate.</li> </ol>	January 20, 2006
1	February 7, 2006	Adopted by Board of Trustees	Revised
1	March 16, 2007	Approved by FERC	
2	August 4, 2011	Revised per Project 2006-6; Revised existing requirements for clarity, retired R3 and R4 and incorporated requirements from IRO-015-1 and IRO-016-1 into this standard.  Adopted by Board of Trustees	Revised

## **Standard IRO-014-3** — Coordination Among Reliability Coordinators

3	November 13, 2014	Adopted by Board of Trustees	Revisions under
			Project 2014-03

### **Guidelines and Technical Basis**

### Rationale:

During development of this standard, text boxes were embedded within the standard to explain the rationale for various parts of the standard. Upon BOT approval, the text from the rationale text boxes was moved to this section.

## **Rationale for Terminology:**

Terminology changed from Adverse Reliability Impact to Emergency for consistency amongst standards. Emergency is a more inclusive term.

## **Rationale for Requirement R7:**

Language added for consistency with proposed TOP-001-3, Requirement R7.

## Reliability Standard IRO-017-1

### A. Introduction

- 1. Title: Outage Coordination
- 2. Number: IRO-017-1
- **3. Purpose:** To ensure that outages are properly coordinated in the Operations Planning time horizon and Near-Term Transmission Planning Horizon.
- 4. Applicability:
  - **4.1.** Reliability Coordinator
  - 4.2. Transmission Operator
  - **4.3.** Balancing Authority
  - 4.4. Planning Coordinator
  - 4.5. Transmission Planner
- 5. Effective Date:

See Implementation Plan.

6. Background:

See Project 2014-03 project page.

## **B.** Requirements and Measures

- **R1.** Each Reliability Coordinator shall develop, implement, and maintain an outage coordination process for generation and Transmission outages within its Reliability Coordinator Area. The outage coordination process shall: [Violation Risk Factor: Medium] [Time Horizon: Operations Planning]
  - **1.1.** Identify applicable roles and reporting responsibilities including:
    - **1.1.1.** Development and communication of outage schedules.
    - **1.1.2.** Assignment of coordination responsibilities for outage schedules between Transmission Operator(s) and Balancing Authority(s).
  - **1.2.** Specify outage submission timing requirements.
  - **1.3.** Define the process to evaluate the impact of Transmission and generation outages within its Wide Area.
  - 1.4. Define the process to coordinate the resolution of identified outage conflicts with its Transmission Operators and Balancing Authorities, and other Reliability Coordinators.
- **M1.** Each Reliability Coordinator shall make available its dated, current, in force outage coordination process for generation and Transmission outages within its Reliability Coordinator Area.

- **R2.** Each Transmission Operator and Balancing Authority shall perform the functions specified in its Reliability Coordinator's outage coordination process. [Violation Risk Factor: Medium] [Time Horizon: Operations Planning]
- **M2.** Each Transmission Operator and Balancing Authority shall provide evidence upon request that it performed the functions specified in its Reliability Coordinator's outage coordination process. Such evidence could include but is not limited to web postings with an electronic notice of the posting, dated operator logs, voice recordings, postal receipts showing the recipient, date and contents, or e-mail records.
- **R3.** Each Planning Coordinator and Transmission Planner shall provide its Planning Assessment to impacted Reliability Coordinators. [Violation Risk Factor: Medium] [Time Horizon: Long-term Planning]
- **M3.** Each Planning Coordinator and Transmission Planner shall provide evidence upon request showing that it provided its Planning Assessment to impacted Reliability Coordinators. Such evidence could include but is not limited to web postings with an electronic notice of the posting, dated operator logs, voice recordings, postal receipts showing the recipient, date and contents, or e-mail records.
- **R4.** Each Planning Coordinator and Transmission Planner shall jointly develop solutions with its respective Reliability Coordinator(s) for identified issues or conflicts with planned outages in its Planning Assessment for the Near-Term Transmission Planning Horizon. [Violation Risk Factor: Medium] [Time Horizon: Long-term Planning]
- M4. Each Planning Coordinator, and Transmission Planner shall provide evidence upon request showing that it jointly developed solutions with its respective Reliability Coordinator(s) for identified issues or conflicts with planned outages in its Planning Assessment for the Near-term Transmission Planning Horizon. Such evidence could include but is not limited to web postings with an electronic notice of the posting, dated operator logs, voice recordings, postal receipts showing the recipient, date and contents, or e-mail records.

## C. Compliance

### 1. Compliance Monitoring Process

## 1.1. Compliance Monitoring Process

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 Assessment Processes

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 responsible entity shall keep data or evidence to show compliance as identified below 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 retain its dated, current, in force, outage coordination process in accordance with Requirement R1 and Measurement M1 as well as any documents in force since the last compliance audit.

Each Transmission Operator and Balancing Authority shall retain evidence for three calendar years that it followed its Reliability Coordinator outage coordination process in accordance with Requirement R2 and Measurement M2.

Each Planning Coordinator and Transmission Planner shall retain evidence for three calendar years that it has its Planning Assessment to impacted Reliability Coordinators in accordance with Requirement R3 and Measurement M3.

Each Reliability Coordinator, Planning Coordinator, and Transmission Planner shall retain evidence for three calendar years that it has coordinated solutions within the Reliability Coordinator Area for identified issues or conflicts with planned outages in the Planning Assessment in accordance with Requirement R4 and Measurement M4.

If a responsible entity is found non-compliant, it shall keep information related to the non-compliance until mitigation is complete and approved 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**

R #	Time	VRF		1	/iolation Severity Level	s
	Horizon		Lower VSL	Moderate VSL	High VSL	Severe VSL
R1	Operations Planning	Medium	The Reliability Coordinator did develop, implement, and maintain an outage coordination process for generation and Transmission outages within its Reliability Coordinator Area but it was missing one of the parts specified in Requirement R1 (Parts 1.1 – 1.4).	The Reliability Coordinator did develop, implement, and maintain an outage coordination process for generation and Transmission outages within its Reliability Coordinator Area but it was missing two of the parts specified in Requirement R1 (Parts 1.1 – 1.4).	The Reliability Coordinator did develop, implement, and maintain an outage coordination process for generation and Transmission outages within its Reliability Coordinator Area but it was missing three of the parts specified in Requirement R1 (Parts 1.1 – 1.4).	The Reliability Coordinator did develop, implement, and maintain an outage coordination process for generation and Transmission outages within its Reliability Coordinator Area but it was missing all four of the parts specified in Requirement R1 (Parts 1.1 – 1.4).  OR,  The Reliability Coordinator did not develop, implement, and maintain an outage coordination process for generation and Transmission outages within its Reliability Coordinator Area.
R2	Operations Planning	Medium	N/A	N/A	N/A	The Transmission Operator or Balancing Authority did not perform the functions specified in its Reliability Coordinator's outage coordination process.
R3	Operations Planning	Medium	N/A	N/A	N/A	The Planning Coordinator or Transmission Planner did not provide its Planning Assessment to impacted Reliability Coordinators.

R #	Time	VRF	Violation Severity Levels			
	Horizon		Lower VSL	Moderate VSL	High VSL	Severe VSL
R4	Operations Planning	Medium	N/A	N/A	N/A	The Planning Coordinator or Transmission Planner did not jointly develop solutions with its respective Reliability Coordinator(s) for identified issues or conflicts with planned outages in its Planning Assessment for the Near- term Transmission Planning Horizon.

## D. Regional Variances

None.

## **E.** Interpretations

None.

## **F. Associated Documents**

**Time Horizon**: The official definition of the Operations Planning Time Horizon is: "operating and resource plans from day-ahead up to and including seasonal." The SDT equates 'seasonal' as being up to one year out and that these requirements covers the period from day-ahead to one year out.

## **Version History**

Version	Date	Action	Change Tracking
1	April 2014	New standard developed by Project 2014-03	New
1	November 13, 2014	Adopted by NERC Board of Trustees	Revisions under Project 2014-03

#### **Guidelines and Technical Basis**

### Rationale:

During development of this standard, text boxes were embedded within the standard to explain the rationale for various parts of the standard. Upon BOT approval, the text from the rationale text boxes was moved to this section.

This standard is in response to issues raised in NOPR paragraph 90 and recommendations made by the Independent Expert Review Panel and SW Outage Report on the need for an outage coordination standard. It allows for one cohesive standard to address all outage coordination concerns as opposed to having multiple requirements spread throughout the various standards.

#### **Rationale for Time Horizon:**

The official definition of the Operations Planning Time Horizon is: "operating and resource plans from day-ahead up to and including seasonal." The SDT equates 'seasonal' as being up to one year out and that these requirements covers the period from day-ahead to one year out.

#### Rationale for R3:

Planning Assessment is a defined term and a document that Planning Coordinators and Transmission Planners already have to produce for approved TPL-001-4. It is not a compilation of load flow studies but a textual summary of what was found in those studies including rationales and assumptions.

### Rationale for R4:

The SDT has re-written Requirement R4 to show that the process starts with the Planning Assessments created by the Planning Coordinator and Transmission Planner and then those Planning Assessments are reviewed and reconciled as needed with the Reliability Coordinator. This is in response to comments in paragraph 90 of the FERC NOPR about directly involving the Reliability Coordinator in the planning process for periods beyond the present one year outreach as well as recommendations in the IERP. The re-write should not be construed as relieving the Reliability Coordinator of responsibilities in this area but simply as a reflection of how the process actually starts.

In the future, the SDT believes that such coordination should take place in the TPL standards and to support that position, the SDT has created an item in a draft SAR for TPL-001-4 that would revise Requirement R8 to make the Reliability Coordinator an explicit party in the review process described there.

In addition, the SDT will submit a request to the Functional Model Working Team to adjust the roles and responsibilities of the Reliability Coordinator to this new paradigm.

## **Reliability Standard TOP-001-3**

### A. Introduction

1. Title: Transmission Operations

2. Number: TOP-001-3

**3. Purpose:** To prevent instability, uncontrolled separation, or Cascading outages that adversely impact the reliability of the Interconnection by ensuring prompt action to prevent or mitigate such occurrences.

### 4. Applicability:

- **4.1.** Balancing Authority
- **4.2.** Transmission Operator
- **4.3.** Generator Operator
- 4.4. Distribution Provider
- 5. Effective Date:

See Implementation Plan.

6. Background:

See Project 2014-03 project page.

## **B.** Requirements and Measures

- **R1.** Each Transmission Operator shall act to maintain the reliability of its Transmission Operator Area via its own actions or by issuing Operating Instructions. [Violation Risk Factor: High][Time Horizon: Same-Day Operations, Real-time Operations]
- M1. Each Transmission Operator shall have and provide evidence which may 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, that will be used to determine that it acted to maintain the reliability of its Transmission Operator Area via its own actions or by issuing Operating Instructions.
- **R2.** Each Balancing Authority shall act to maintain the reliability of its Balancing Authority Area via its own actions or by issuing Operating Instructions. [Violation Risk Factor: High][Time Horizon: Same-Day Operations, Real-time Operations]
- M2. Each Balancing Authority shall have and provide evidence which may 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, that will be used to determine that it acted to maintain the reliability of its Balancing Authority Area via its own actions or by issuing Operating Instructions.

- **R3.** Each Balancing Authority, Generator Operator, and Distribution Provider shall comply with each Operating Instruction issued by its Transmission Operator(s), unless such action cannot be physically implemented or it would violate safety, equipment, regulatory, or statutory requirements. [Violation Risk Factor: High] [Time Horizon: Same-Day Operations, Real-Time Operations]
- M3. Each Balancing Authority, Generator Operator, and Distribution Provider shall make available upon request, evidence that it complied with each Operating Instruction issued by the Transmission Operator(s) unless such action could not be physically implemented or it would have violated safety, equipment, regulatory, or statutory requirements. 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 in electronic or hard copy format. In such cases, the Balancing Authority, Generator Operator, and Distribution Provider shall have and provide copies of the safety, equipment, regulatory, or statutory requirements as evidence for not complying with the Transmission Operator's Operating Instruction. If such a situation has not occurred, the Balancing Authority, Generator Operator, or Distribution Provider may provide an attestation.
- **R4.** Each Balancing Authority, Generator Operator, and Distribution Provider shall inform its Transmission Operator of its inability to comply with an Operating Instruction issued by its Transmission Operator. [Violation Risk Factor: High] [Time Horizon: Same-Day Operations, Real-Time Operations]
- **M4.** Each Balancing Authority, Generator Operator, and Distribution Provider shall make available upon request, evidence which may include but is not limited to dated operator logs, voice recordings or transcripts of voice recordings, electronic communications, or equivalent evidence in electronic or hard copy format, that it informed its Transmission Operator of its inability to comply with its Operating Instruction issued. If such a situation has not occurred, the Balancing Authority, Generator Operator, or Distribution Provider may provide an attestation.
- **R5.** Each Transmission Operator, Generator Operator, and Distribution Provider shall comply with each Operating Instruction issued by its Balancing Authority, unless such action cannot be physically implemented or it would violate safety, equipment, regulatory, or statutory requirements. [Violation Risk Factor: High] [Time Horizon: Same-Day Operations, Real-Time Operations]
- M5. Each Transmission Operator, Generator Operator, and Distribution Provider shall make available upon request, evidence that it complied with each Operating Instruction issued by its Balancing Authority unless such action could not be physically implemented or it would have violated safety, equipment, regulatory, or statutory requirements. 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 in electronic or hard copy format. In such cases, the Transmission Operator, Generator Operator, and Distribution Provider shall have and

- provide copies of the safety, equipment, regulatory, or statutory requirements as evidence for not complying with the Balancing Authority's Operating Instruction. If such a situation has not occurred, the Transmission Operator, Generator Operator, or Distribution Provider may provide an attestation.
- **R6.** Each Transmission Operator, Generator Operator, and Distribution Provider shall inform its Balancing Authority of its inability to comply with an Operating Instruction issued by its Balancing Authority. [Violation Risk Factor: High] [Time Horizon: Same-Day Operations, Real-Time Operations]
- M6. Each Transmission Operator, Generator Operator, and Distribution Provider shall make available upon request, evidence which may include but is not limited to dated operator logs, voice recordings or transcripts of voice recordings, electronic communications, or equivalent evidence in electronic or hard copy format, that it informed its Balancing Authority of its inability to comply with its Operating Instruction. If such a situation has not occurred, the Transmission Operator, Generator Operator, or Distribution Provider may provide an attestation.
- **R7.** Each Transmission Operator shall assist other Transmission Operators within its Reliability Coordinator Area, if requested and able, provided that the requesting Transmission Operator has implemented its comparable Emergency procedures, unless such assistance cannot be physically implemented or would violate safety, equipment, regulatory, or statutory requirements. [Violation Risk Factor: High] [Time Horizon: Real-Time Operations]
- M7. Each Transmission Operator shall make available upon request, evidence that comparable requested assistance, if able, was provided to other Transmission Operators within its Reliability Coordinator Area unless such assistance could not be physically implemented or would have violated safety, equipment, regulatory, or statutory requirements. 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 in electronic or hard copy format. If no request for assistance was received, the Transmission Operator may provide an attestation.
- **R8.** Each Transmission Operator shall inform its Reliability Coordinator, known impacted Balancing Authorities, and known impacted Transmission Operators of its actual or expected operations that result in, or could result in, an Emergency. [Violation Risk Factor: High] [Time Horizon: Operations Planning, Same-Day Operations, Real-Time Operations]
- **M8.** Each Transmission Operator shall make available upon request, evidence that it informed its Reliability Coordinator, known impacted Balancing Authorities, and known impacted Transmission Operators of its actual or expected operations that result in, or could result in, an Emergency. 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 no such situations have occurred, the Transmission Operator may provide an attestation.
- **R9.** Each Balancing Authority and Transmission Operator shall notify its Reliability Coordinator and known impacted interconnected entities of all planned outages, and unplanned outages of 30 minutes or more, for telemetering and control equipment, monitoring and assessment capabilities, and associated communication channels between the affected entities. [Violation Risk Factor: Medium] [Time Horizon: Operations Planning, Same-Day Operations, Real-Time Operations]
- M9. Each Balancing Authority and Transmission Operator shall make available upon request, evidence that it notified its Reliability Coordinator and known impacted interconnected entities of all planned outages, and unplanned outages of 30 minutes or more, for telemetering and control equipment, monitoring and assessment capabilities, and associated communication channels. 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 Balancing Authority or Transmission Operator may provide an attestation.
- **R10.** Each Transmission Operator shall perform the following as necessary for determining System Operating Limit (SOL) exceedances within its Transmission Operator Area: [Violation Risk Factor: High] [Time Horizon: Real-Time Operations]
  - **10.1.** Within its Transmission Operator Area, monitor Facilities and the status of Special Protection Systems, and
  - **10.2.** Outside its Transmission Operator Area, obtain and utilize status, voltages, and flow data for Facilities and the status of Special Protection Systems.
- M10. Each Transmission Operator shall have, and provide upon request, evidence that could include but is not limited to Energy Management System description documents, computer printouts, SCADA data collection, or other equivalent evidence that will be used to confirm that it monitored or obtained and utilized status, voltages, and flow data for Facilities and the status of Special Protection Systems as required to determine any System Operating Limit (SOL) exceedances within its Transmission Operator Area.
- **R11.** Each Balancing Authority shall monitor its Balancing Authority Area, including the status of Special Protection Systems that impact generation or Load, in order to maintain generation-Load-interchange balance within its Balancing Authority Area and support Interconnection frequency. [Violation Risk Factor: High] [Time Horizon: Real-Time Operations]
- M11. Each Balancing Authority shall have, and provide upon request, evidence that could include but is not limited to Energy Management System description documents, computer printouts, SCADA data collection, or other equivalent evidence that will be

- used to confirm that it monitors its Balancing Authority Area, including the status of Special Protection Systems that impact generation or Load, in order to maintain generation-Load-interchange balance within its Balancing Authority Area and support Interconnection frequency.
- **R12.** Each Transmission Operator shall not operate outside any identified Interconnection Reliability Operating Limit (IROL) for a continuous duration exceeding its associated IROL T<sub>v</sub>. [Violation Risk Factor: High] [Time Horizon: Real-time Operations]
- M12. Each Transmission Operator shall make available evidence to show that for any occasion in which it operated outside any identified Interconnection Reliability Operating Limit (IROL), the continuous duration did not exceed its associated IROL T<sub>v</sub>. Such evidence could include but is not limited to dated computer logs or reports in electronic or hard copy format specifying the date, time, duration, and details of the excursion. If such a situation has not occurred, the Transmission Operator may provide an attestation that an event has not occurred.
- **R13.** Each Transmission Operator shall ensure that a Real-time Assessment is performed at least once every 30 minutes. [Violation Risk Factor: High] [Time Horizon: Real-time Operations]
- **M13.** Each Transmission Operator shall have, and make available upon request, evidence to show it ensured that a Real-Time Assessment was 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.
- **R14.** Each Transmission Operator shall initiate its Operating Plan to mitigate a SOL exceedance identified as part of its Real-time monitoring or Real-time Assessment. [Violation Risk Factor: High] [Time Horizon: Real-time Operations]
- **M14.** Each Transmission Operator shall have evidence that it initiated its Operating Plan for mitigating SOL exceedances identified as part of its Real-time monitoring or Real-time Assessments. This evidence could include but is not limited to dated computer logs showing times the Operating Plan was initiated, dated checklists, or other evidence.
- **R15.** Each Transmission Operator shall inform its Reliability Coordinator of actions taken to return the System to within limits when a SOL has been exceeded. [Violation Risk Factor: Medium] [Time Horizon: Real-Time Operations]
- M15. Each Transmission Operator shall make available evidence that it informed its Reliability Coordinator of actions taken to return the System to within limits when a SOL was exceeded. Such evidence could include but is not limited to dated operator logs, voice recordings or transcripts of voice recordings, or dated computer printouts. If such a situation has not occurred, the Transmission Operator may provide an attestation.
- **R16.** Each Transmission Operator shall provide its System Operators with the authority to approve planned outages and maintenance of its telemetering and control

- equipment, monitoring and assessment capabilities, and associated communication channels between affected entities. [Violation Risk Factor: High] [Time Horizon: Operations Planning, Same-Day Operations, Real-time Operations]
- M16. Each Transmission Operator shall have, and provide upon request, evidence that could include but is not limited to a documented procedure or equivalent evidence that will be used to confirm that the Transmission Operator has provided its System Operators with the authority to approve planned outages and maintenance of telemetering and control equipment, monitoring and assessment capabilities, and associated communication channels between affected entities.
- **R17.** Each Balancing Authority shall provide its System Operators with the authority to approve planned outages and maintenance of its telemetering and control equipment, monitoring and assessment capabilities, and associated communication channels between affected entities. [Violation Risk Factor: High] [Time Horizon: Operations Planning, Same-Day Operations, Real-time Operations]
- M17. Each Balancing Authority shall have, and provide upon request, evidence that could include but is not limited to a documented procedure or equivalent evidence that will be used to confirm that the Balancing Authority has provided its System Operators with the authority to approve planned outages and maintenance of its telemetering and control equipment, monitoring and assessment capabilities, and associated communication channels between affected entities.
- **R18.** Each Transmission Operator shall operate to the most limiting parameter in instances where there is a difference in SOLs. [Violation Risk Factor: High] [Time Horizon: Operations Planning, Same-Day Operations, Real-time Operations]
- **M18.** Each Transmission Operator shall have, and provide upon request, evidence that could include but is not limited to operator logs, voice recordings, electronic communications, or equivalent evidence that will be used to determine if it operated to the most limiting parameter in instances where there is a difference in SOLs.
- **R19.** Each Transmission Operator shall have data exchange capabilities with the entities that it has identified that it needs data from in order to maintain reliability in its Transmission Operator Area. [Violation Risk Factor: High] [Time Horizon: Operations Planning, Same-Day Operations, Real-time Operations]
- **M19.** Each Transmission Operator shall have, and provide upon request, evidence that could include, but is not limited to, operator logs, system specifications, or other evidence that it has data exchange capabilities with the entities that it has identified that it needs data from in order to maintain reliability in its Transmission Operator Area.
- **R20.** Each Balancing Authority shall have data exchange capabilities with the entities that it has identified that it needs data from in order to maintain reliability in its Balancing Authority Area. [Violation Risk Factor: High] [Time Horizon: Operations Planning, Same-Day Operations, Real-time Operations]

**M20.** Each Balancing Authority shall have, and provide upon request, evidence that could include, but is not limited to, operator logs, system specifications, or other evidence that it has data exchange capabilities with the entities that it has identified that it needs data from in order to maintain reliability in its Balancing Authority Area.

## 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 Assessment Processes

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 Balancing Authority, Transmission Operator, Generator Operator, and Distribution Provider shall each keep data or evidence for each applicable Requirement R1 through R11, and R15 through R20 and Measure M1 through M11, and M15 through M20 for the current calendar year and one previous calendar year, with the exception of operator logs and voice recordings which shall be retained for a minimum of ninety calendar days, unless directed by its Compliance Enforcement Authority to retain specific evidence for a longer period of time as part of an investigation.

Each Transmission Operator shall retain evidence for three calendar years of any occasion in which it has exceeded an identified IROL and its associated IROL  $T_v$  as specified in Requirement R12 and Measure M12 and that it initiated its Operating Plan to mitigate a SOL exceedance as specified in Requirement R14 and Measurement M14.

Each Transmission Operator shall keep data or evidence for Requirement R13 and Measure M13 for a rolling 30-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 Balancing Authority, Transmission Operator, Generator Operator, or Distribution Provider is found non-compliant, it shall keep information related to the non-compliance until mitigation is complete and approved 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**

R #	Time Horizon	VRF		Viol	ation Severity Levels	
			Lower VSL	Moderate VSL	High VSL	Severe VSL
R1	Same-Day Operations, Real-time Operations	High	N/A	N/A	N/A	The Transmission Operator failed to act to maintain the reliability of its Transmission Operator Area via its own actions or by issuing Operating Instructions.
R2	Same-Day Operations, Real-time Operations	High	N/A	N/A	N/A	The Balancing Authority failed to act to maintain the reliability of its Balancing Authority Area via its own actions or by issuing Operating Instructions.
R3	Same-Day Operations, Real-Time Operations	High	N/A	N/A	N/A	The responsible entity did not comply with an Operating Instruction issued by the Transmission Operator, and such action could have been physically implemented and would not have violated safety, equipment, regulatory, or statutory requirements.
R4	Same-Day Operations, Real-Time Operations	High	N/A	N/A	N/A	The responsible entity did not inform its Transmission Operator of its inability to comply with an Operating Instruction issued by its Transmission Operator.

R #	Time Horizon	VRF	Violation Severity Levels				
			Lower VSL	Moderate VSL	High VSL	Severe VSL	
R5	Same-Day Operations, Real-time Operations	High	N/A	N/A	N/A	The responsible entity did not comply with an Operating Instruction issued by the Balancing Authority, and such action could have been physically implemented and would not have violated safety, equipment, regulatory, or statutory requirements.	
R6	Same-Day Operations, Real-Time Operations	High	N/A	N/A	N/A	The responsible entity did not inform its Balancing Authority of its inability to comply with an Operating Instruction issued by its Balancing Authority.	
R7	Real-Time Operations	High	N/A	N/A	N/A	The Transmission Operator did not provide comparable assistance to other Transmission Operators within its Reliability Coordinator Area, when requested and able, and the requesting entity had implemented its Emergency procedures, and such actions could have been physically implemented and would not have violated safety, equipment, regulatory, or statutory requirements.	

R #	Time Horizon	VRF		Violati	on Severity Levels	
			Lower VSL	Moderate VSL	High VSL	Severe VSL
you fii	nd the situation	that fits. In	l VSLs only, the intent of t this manner, the VSL wi	 he SDT is to start with the	I e Severe VSL first and then t y size of entity. If a small er	o work your way to the left until
			Operators, whichever is greater, of its actual or expected operations that resulted in, or could have resulted in, an Emergency on respective Transmission Operator Areas. OR, The Transmission Operator did not inform one known impacted Balancing Authorities or 5% or less of the known	Transmission Operators, whichever is greater, of its actual or expected operations that resulted in, or could have resulted in, an Emergency on respective Transmission Operator Areas. OR, The Transmission Operator did not inform two known impacted Balancing Authorities or more	greater, of its actual or expected operations that resulted in, or could have resulted in, an Emergency on respective Transmission Operator Areas. OR, The Transmission Operator did not inform three known impacted Balancing Authorities or more than 10% and less than or equal to 15% of the known impacted Balancing Authorities, whichever is greater, of	The Transmission Operator did not inform four or more known impacted Transmission Operators or more than 15% of the known impacted Transmission Operators of its actual or expected operations that resulted in, or could have resulted in, an Emergency on those respective Transmission Operator Areas.  OR, The Transmission Operator did not inform four or more known impacted Balancing Authorities or more than 15% of the known impacted

R #	Time Horizon	VRF		Violati	on Severity Levels	
			Lower VSL	Moderate VSL	High VSL	Severe VSL
			impacted Balancing Authorities, whichever is greater, of its actual or expected operations that resulted in, or could have resulted in, an Emergency on respective Balancing Authority Areas.	than 5% and less than or equal to 10% of the known impacted Balancing Authorities, whichever is greater, of its actual or expected operations that resulted in, or could have resulted in, an Emergency on respective Balancing Authority Areas.	its actual or expected operations that resulted in, or could have resulted in, an Emergency on respective Balancing Authority Areas.	Balancing Authorities of its actual or expected operations that resulted in, or could have resulted in, an Emergency on respective Balancing Authority Areas.
R9	Operations Planning, Same-Day Operations, Real-Time Operations	Medium	The responsible entity did not notify one known impacted interconnected entity or 5% or less of the known impacted entities, whichever is greater, of a planned outage, or an unplanned outage of 30 minutes or more, for telemetering and control equipment, monitoring and assessment capabilities, or associated	The responsible entity did not notify two known impacted interconnected entities or more than 5% and less than or equal to 10% of the known impacted entities, whichever is greater, of a planned outage, or an unplanned outage of 30 minutes or more, for telemetering and control equipment, monitoring and assessment capabilities, or	The responsible entity did not notify three known impacted interconnected entities or more than 10% and less than or equal to 15% of the known impacted entities, whichever is greater, of a planned outage, or an unplanned outage of 30 minutes or more, for telemetering and control equipment, monitoring and assessment capabilities, or associated communication	The responsible entity did not notify its Reliability Coordinator of a planned outage, or an unplanned outage of 30 minutes or more, for telemetering and control equipment, monitoring and assessment capabilities, and associated communication channels.  OR, The responsible entity did not notify four or more known impacted interconnected entities or more than 15% of the known impacted entities, whichever is greater, of a planned outage, or an

R #	Time Horizon	VRF		Violation Severity Levels			
			Lower VSL	Moderate VSL	High VSL	Severe VSL	
			communication channels between the affected entities.	associated communication channels between the affected entities.	channels between the affected entities.	unplanned outage of 30 minutes or more, for telemetering and control equipment, monitoring and assessment capabilities, or associated communication channels between the affected entities.	
R10	Real-Time Operations	High	N/A	The Transmission Operator did not monitor one of the items listed in Requirement R10, Part 10.1. OR, The Transmission Operator did not obtain and utilize one of the items listed in Requirement R10, Part 10.2.	The Transmission Operator did not monitor one of the items listed in Requirement R10, Part 10.1 and did not obtain and utilize one of the items listed in Requirement R10, Part 10.2.	The Transmission Operator did not monitor Facilities and the status of Special Protection Systems within its Transmission Operator Area and did not obtain and utilize data deemed as necessary from outside its Transmission Operator Area.	
R11	Real-Time Operations	High	N/A	N/A	The Balancing Authority did not monitor the status of Special Protection Systems that impact generation or Load, in order to maintain generation-Load-interchange	The Balancing Authority did not monitor its Balancing Authority Area, in order to maintain generation-Loadinterchange balance within its Balancing Authority Area and support Interconnection frequency.	

R #	Time Horizon	VRF		Violation Severity Levels				
			Lower VSL	Moderate VSL	High VSL	Severe VSL		
					balance within its Balancing Authority Area and support Interconnection frequency.			
R12	Real-Time Operations	High	N/A	N/A	N/A	The Transmission Operator exceeded an identified Interconnection Reliability Operating Limit (IROL) for a continuous duration greater than its associated IROL T <sub>v</sub> .		
R13	Same-Day Operations, Real-Time Operations	High	For any sample 24-hour period within the 30-day retention period, the Transmission Operator's Real-time Assessment was not conducted for one 30-minute period within that 24-hour period.	For any sample 24-hour period within the 30-day retention period, the Transmission Operator's Real-time Assessment was not conducted for two 30-minute periods within that 24-hour period.	For any sample 24-hour period within the 30-day retention period, the Transmission Operator's Real-time Assessment was not conducted for three 30-minute periods within that 24-hour period.	For any sample 24-hour period within the 30-day retention period, the Transmission Operator's Real-time Assessment was not conducted for four or more 30-minute periods within that 24-hour period.		
R14.	Real-Time Operations	High	N/A	N/A	N/A	The Transmission Operator did not initiate its Operating Plan for mitigating a SOL exceedance identified as part of its Real-time monitoring or Real-time Assessment		

R #	Time Horizon	VRF		Violation Severity Levels				
			Lower VSL	Moderate VSL	High VSL	Severe VSL		
R15.	Real-Time Operations	Medium	N/A	N/A	N/A	The Transmission Operator did not inform its Reliability Coordinator of actions taken to return the System to within limits when a SOL had been exceeded.		
R16.	Operations Planning, Same-Day Operations, Real-Time Operations	High	N/A	N/A	N/A	The Transmission Operator did not provide its System Operators with the authority to approve planned outages and maintenance of its telemetering and control equipment, monitoring and assessment capabilities, and associated communication channels between affected entities.		
R17.	Operations Planning, Same-Day Operations, Real-Time Operations	High	N/A	N/A	N/A	The Balancing Authority did not provide its System Operators with the authority to approve planned outages and maintenance of its telemetering and control equipment, monitoring and assessment capabilities, and associated communication channels between affected entities.		

R #	Time Horizon	VRF		Violati	on Severity Levels	
			Lower VSL	Moderate VSL	High VSL	Severe VSL
R18	Operations Planning, Same-Day Operations, Real-time Operations	High	N/A	N/A	N/A	The Transmission Operator failed to operate to the most limiting parameter in instances where there was a difference in SOLs.
R19	Operations Planning, Same-Day Operations, Real-time Operations	High	The Transmission Operator did not have data exchange capabilities with one identified entity, or 5% or less of the applicable entities, whichever is greater.	The Transmission Operator did not have data exchange capabilities with two identified entities, or more than 5% or less than or equal to 10% of the applicable entities, whichever is greater.	The Transmission Operator did not have data exchange capabilities with three identified entities, or more than 10% or less than or equal to 15% of the applicable entities, whichever is greater.	The Transmission Operator did not have data exchange capabilities with four or more identified entities or greater than 15% of the applicable entities, whichever is greater.
R20	Operations Planning, Same-Day Operations, Real-time Operations	High	The Balancing Authority did not have data exchange capabilities with one identified entity, or 5% or less of the applicable entities, whichever is greater.	The Balancing Authority did not have data exchange capabilities with two identified entities, or more than 5% or less than or equal to 10% of the applicable entities, whichever is greater.	The Balancing Authority did not have data exchange capabilities with three identified entities, or more than 10% or less than or equal to 15% of the applicable entities, whichever is greater.	The Balancing Authority did not have data exchange capabilities with four or more identified entities or greater than 15% of the applicable entities, whichever is greater.

## D. Regional Variances

None.

## **E.** Interpretations

None.

#### F. Associated Documents

The SDT has created the SOL Exceedance White Paper as guidance on SOL issues and the URL for that document is: http://www.nerc.com/pa/stand/Pages/TOP0013RI.aspx.

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.

## **Version History**

Version	Date	Action	Change Tracking
0	April 1, 2005	Effective Date	New
0	August 8, 2005	Removed "Proposed" from Effective Date	Errata
1	November 1, 2006	Adopted by Board of Trustees	Revised
1a	May 12, 2010	Added Appendix 1 – Interpretation of R8 approved by Board of Trustees on May 12, 2010	Interpretation
1a	September 15, 2011	FERC Order issued approved the Interpretation of R8 (FERC Order became effective November 21, 2011)	Interpretation
2	May 6, 2012	Revised under Project 2007-03	Revised
2	May 9, 2012	Adopted by Board of Trustees	Revised
3	February 12, 2015	Adopted by Board of Trustees	Revisions under Project 2014-03

### Rationale:

During development of this standard, text boxes were embedded within the standard to explain the rationale for various parts of the standard. Upon BOT approval, the text from the rationale text boxes was moved to this section.

### **Rationale for Requirement R3:**

The phrase 'cannot be physically implemented' means that a Transmission Operator may request something to be done that is not physically possible due to its lack of knowledge of the system involved.

## **Rationale for Requirement R10:**

New proposed Requirement R10 is derived from approved IRO-003-2, Requirement R1, adapted to the Transmission Operator Area. This new requirement is in response to NOPR paragraph 60 concerning monitoring capabilities for the Transmission Operator. New Requirement R11

covers the Balancing Authorities. Monitoring of external systems can be accomplished via data links.

## **Rationale for Requirement R13:**

The new Requirement R13 is in response to NOPR paragraphs 55 and 60 concerning Real-time analysis responsibilities for Transmission Operators and is copied from approved IRO-008-1, Requirement R2. The Transmission Operator's Operating Plan will describe how to perform the Real-time Assessment. The Operating Plan should contain instructions as to how to perform Operational Planning Analysis and Real-time Assessment with detailed instructions and timing requirements as to how to adapt to conditions where processes, procedures, and automated software systems are not available (if used). This could include instructions such as an indication that no actions may be required if system conditions have not changed significantly and that previous Contingency analysis or Real-time Assessments may be used in such a situation.

#### **Rationale for Requirement R14:**

The original Requirement R8 was deleted and original Requirements R9 and R11 were revised in order to respond to NOPR paragraph 42 which raised the issue of handling all SOLs and not just a sub-set of SOLs. The SDT has developed a white paper on SOL exceedances that explains its intent on what needs to be contained in such an Operating Plan. These Operating Plans are developed and documented in advance of Real-time and may be developed from Operational Planning Assessments required per proposed TOP-002-4 or other assessments. Operating Plans could be augmented by temporary operating guides which outline prevention/mitigation plans for specific situations which are identified day-to-day in an Operational Planning Assessment or a Real-time Assessment. The intent is to have a plan and philosophy that can be followed by an operator.

## Rationale for Requirements R16 and R17:

In response to IERP Report recommendation 3 on authority.

## **Rationale for Requirement R18:**

Moved from approved IRO-005-3.1a, Requirement R10. Transmission Service Provider, Distribution Provider, Load-Serving Entity, Generator Operator, and Purchasing-Selling Entity are deleted as those entities will receive instructions on limits from the responsible entities cited in the requirement. Note — Derived limits replaced by SOLs for clarity and specificity. SOLs include voltage, Stability, and thermal limits and are thus the most limiting factor.

## Rationale for Requirements R19 and R20:

Added for consistency with proposed IRO-002-4, Requirement R1. Data exchange capabilities are required to support the data specification concept in proposed TOP-003-3.

## Reliability Standard TOP-002-4

#### A. Introduction

1. Title: Operations Planning

2. Number: TOP-002-4

**3. Purpose:** To ensure that Transmission Operators and Balancing Authorities have plans for operating within specified limits.

### 4. Applicability:

- **4.1.** Transmission Operator
- **4.2.** Balancing Authority
- 5. Effective Date:

See Implementation Plan.

6. Background:

See Project 2014-03 project page.

## **B.** Requirements and Measures

- R1. Each Transmission Operator shall have an Operational Planning Analysis that will allow it to assess whether its planned operations for the next day within its Transmission Operator Area will exceed any of its System Operating Limits (SOLs). [Violation Risk Factor: Medium] [Time Horizon: Operations Planning]
- **M1.** Each Transmission Operator shall have evidence of a completed Operational Planning Analysis. Such evidence could include but is not limited to dated power flow study results.
- **R2.** Each Transmission Operator shall have an Operating Plan(s) for next-day operations to address potential System Operating Limit (SOL) exceedances identified as a result of its Operational Planning Analysis as required in Requirement R1. [Violation Risk Factor: Medium] [Time Horizon: Operations Planning]
- **M2.** Each Transmission Operator shall have evidence that it has an Operating Plan to address potential System Operating Limits (SOLs) exceedances identified as a result of the Operational Planning Analysis performed in Requirement R1. Such evidence could include but it is not limited to plans for precluding operating in excess of each SOL that was identified as a result of the Operational Planning Analysis.
- **R3.** Each Transmission Operator shall notify entities identified in the Operating Plan(s) cited in Requirement R2 as to their role in those plan(s). [Violation Risk Factor: Medium] [Time Horizon: Operations Planning]
- **M3.** Each Transmission Operator shall have evidence that it notified entities identified in the Operating Plan(s) cited in Requirement R2 as to their role in the plan(s). Such evidence could include but is not limited to dated operator logs, or e-mail records.

- **R4.** Each Balancing Authority shall have an Operating Plan(s) for the next-day that addresses: [Violation Risk Factor: Medium] [Time Horizon: Operations Planning]
  - 4.1 Expected generation resource commitment and dispatch
  - 4.2 Interchange scheduling
  - **4.3** Demand patterns
  - 4.4 Capacity and energy reserve requirements, including deliverability capability
- **M4.** Each Balancing Authority shall have evidence that it has developed a plan to operate within the criteria identified. Such evidence could include but is not limited to dated operator logs or e-mail records.
- **R5.** Each Balancing Authority shall notify entities identified in the Operating Plan(s) cited in Requirement R4 as to their role in those plan(s). [Violation Risk Factor: Medium] [Time Horizon: Operations Planning]
- **M5.** Each Balancing Authority shall have evidence that it notified entities identified in the plan(s) cited in Requirement R4 as to their role in the plan(s). Such evidence could include but is not limited to dated operator logs or e-mail records.
- **R6.** Each Transmission Operator shall provide its Operating Plan(s) for next-day operations identified in Requirement R2 to its Reliability Coordinator. [Violation Risk Factor: Medium] [Time Horizon: Operations Planning]
- **M6.** Each Transmission Operator shall have evidence that it provided its Operating Plan(s) for next-day operations identified in Requirement R2 to its Reliability Coordinator. Such evidence could include but is not limited to dated operator logs or e-mail records.
- **R7.** Each Balancing Authority shall provide its Operating Plan(s) for next-day operations identified in Requirement R4 to its Reliability Coordinator. [Violation Risk Factor: Medium] [Time Horizon: Operations Planning]
- **M7.** Each Balancing Authority shall have evidence that it provided its Operating Plan(s) for next-day operations identified in Requirement R4 to its Reliability Coordinator. Such evidence could include but is not limited to dated operator logs or e-mail records.

## 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 Assessment Processes

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 Transmission Operator and Balancing Authority shall keep data or evidence to show compliance for each applicable Requirement for a rolling 90-calendar days period for analyses, the most recent 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.

If a Transmission Operator or Balancing Authority 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**

R #	Time Horizon	VRF	Violation Severity Levels			
			Lower VSL	Moderate VSL	High VSL	Severe VSL
R1	Operations Planning	Medium	N/A	N/A	N/A	The Transmission Operator did not have an Operational Planning Analysis allowing it to assess whether its planned operations for the next day within its Transmission Operator Area exceeded any of its System Operating Limits (SOLs).
R2	Operations Planning	Medium	N/A	N/A	N/A	The Transmission Operator did not have an Operating Plan to address potential System Operating Limit (SOL) exceedances identified as a result of the Operational Planning Analysis performed in Requirement R1.

R #	Time Horizon	VRF	Violation Severity Levels						
			Lower VSL	Moderate VSL	High VSL	Severe VSL			
the left	For the Requirement R3 and R5 VSLs only, the intent of the SDT is to start with the Severe VSL first and then to work your way to he left until you find the situation that fits. In this manner, the VSL will not be discriminatory by size of entity. If a small entity has just one affected reliability entity to inform, the intent is that that situation would be a Severe violation.								
R3	Operations Planning	Medium	The Transmission Operator did not notify one impacted entity or 5% or less of the entities, whichever is greater identified in the Operating Plan(s) as to their role in the plan(s).	The Transmission Operator did not notify two entities or more than 5% and less than or equal to 10% of the impacted entities, whichever is greater, identified in the Operating Plan(s) as to their role in the plan(s).	The Transmission Operator did not notify three impacted entities or more than 10% and less than or equal to 15% of the entities, whichever is greater, identified in the Operating Plan(s) as to their role in the plan(s).	The Transmission Operator did not notify four or more entities or more than 15% of the impacted NERC identified in the Operating Plan(s) as to their role in the plan(s).			
R4	Operations Planning	Medium	The Balancing Authority has an Operating Plan but it does not address one of the criteria in Requirement R4.	The Balancing Authority has an Operating Plan but it does not address two of the criteria in Requirement R4.	The Balancing Authority has an Operating Plan but it does not address three of the criteria in Requirement R4.	The Balancing Authority did not have an Operating Plan.			
R5	Operations Planning	Medium	The Balancing Authority did not notify one impacted entity or 5% or less	The Balancing Authority did not notify two entities or more than 5% and	The Balancing Authority did not notify three impacted entities or	The Balancing Authority did not notify four or more entities or more than			

R #	Time Horizon	VRF	Violation Severity Levels			
			Lower VSL	Moderate VSL	High VSL	Severe VSL
			of the entities, whichever is greater, identified in the Operating Plan(s) as to their role in the plan(s).	less than or equal to 10% of the impacted entities, whichever is greater, identified in the Operating Plan(s) as to their role in the plan(s).	more than 10% and less than or equal to 15% of the entities, whichever is greater, identified in the Operating Plan(s) as to their role in the plan(s).	15% of the impacted entities identified in the Operating Plan(s) as to their role in the plan(s).
R6	Operations Planning	Medium	N/A	N/A	N/A	The Transmission Operator did not provide its Operating Plan(s) for next-day operations as identified in Requirement R2 to its Reliability Coordinator.
R7	Operations Planning	Medium	N/A	N/A	N/A	The Balancing Authority did not provide its Operating Plan(s) for next-day operations as identified in Requirement R4 to its Reliability Coordinator.

## D. Regional Variances

None.

## E. Interpretations

None.

#### F. Associated Documents

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 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.

# **Version History**

Version	Date Action		Change Tracking
0	April 1, 2005	Effective Date	New
0	August 8, 2005	Removed "Proposed" from Effective Date	Errata
1	August 2, 2006	Adopted by Board of Trustees	Revised
2	November 1, 2006	Adopted by Board of Trustees	Revised
2	June 14, 2007	Fixed typo in R11., (subject to)	Errata
2a	February 10, 2009	Added Appendix 1 – Interpretation of R11 approved by BOT on February 10, 2009	Interpretation
2a	December 2, 2009	ecember 2, 2009 Interpretation of R11 approved by FERC on December 2, 2009	
2b	November 4, 2010	ovember 4, 2010 Added Appendix 2 – Interpretation of R10 adopted by the Board of Trustees	
2b	October 20, 2011	October 20, 2011 FERC Order issued approving the Interpretation of R10 (FERC's Order became effective on October 20, 2011)	
2.1b	March 8, 2012	Errata adopted by Standards Committee;  (Removed unnecessary language from the Effective Date section. Deleted retired sub-requirements from Requirement R14)	Errata
2.1b	April 11, 2012	Additional errata adopted by Standards Committee; (Deleted language from retired sub-requirement from Measure M7)	Errata
2.1b	September 13, 2012 FERC approved		Errata
3	May 6, 2012	Revisions under Project 2007-03	Revised

## Standard TOP-002-4 — Operations Planning

3	May 9, 2012	May 9, 2012 Adopted by Board of Trustees	
4	April 2014	Revisions under Project 2014-03	Revised
4	November 13, 2014	Adopted by NERC Board of Trustees	Revisions under Project 2014-03

#### **Guidelines and Technical Basis**

#### Rationale:

During development of this standard, text boxes were embedded within the standard to explain the rationale for various parts of the standard. Upon BOT approval, the text from the rationale text boxes was moved to this section.

#### **Rationale for Definitions:**

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.

#### Rationale for R1:

Terms deleted in Requirement R1 as they are now contained in the revised definition of Operational Planning Analysis

#### **Rationale for R2:**

The change to Requirement R2 is in response to NOPR paragraph 42 and in concert with proposed changes made to proposed TOP-001-4

#### Rationale for R3:

Changes in response to IERP recommendation

#### Rationale for R4 and R5:

These Requirements were added to address IERP recommendations

#### Rationale for R6 and R7:

Added in response to SW Outage Report recommendation 1

## Reliability Standard TOP-003-3

#### A. Introduction

- 1. Title: Operational Reliability Data
- 2. Number: TOP-003-3
- **3. Purpose:** To ensure that the Transmission Operator and Balancing Authority have data needed to fulfill their operational and planning responsibilities.
- 4. Applicability:
  - **4.1.** Transmission Operator
  - **4.2.** Balancing Authority
  - 4.3. Generator Owner
  - 4.4. Generator Operator
  - **4.5.** Load-Serving Entity
  - **4.6.** Transmission Owner
  - 4.7. Distribution Provider
- 5. Effective Date:

See Implementation Plan.

6. Background:

See Project 2014-03 project page.

## B. Requirements and Measures

- **R1.** Each Transmission Operator shall maintain a documented specification for the data necessary for it to perform its Operational Planning Analyses, Real-time monitoring, and Real-time Assessments. The data specification shall include, but not be limited to: [Violation Risk Factor: Low] [Time Horizon: Operations Planning]
  - **1.1.** A list of data and information needed by the Transmission Operator to support its Operational Planning Analyses, Real-time monitoring, and Real-time Assessments including non-BES data and external network data as deemed necessary by the Transmission Operator.
  - **1.2.** Provisions for notification of current Protection System and Special Protection System status or degradation that impacts System reliability.
  - **1.3.** A periodicity for providing data.
  - **1.4.** The deadline by which the respondent is to provide the indicated data.
- **M1.** Each Transmission Operator shall make available its dated, current, in force documented specification for data.

- **R2.** Each Balancing Authority shall maintain a documented specification for the data necessary for it to perform its analysis functions and Real-time monitoring. The data specification shall include, but not be limited to: [Violation Risk Factor: Low] [Time Horizon: Operations Planning]
  - **2.1.** A list of data and information needed by the Balancing Authority to support its analysis functions and Real-time monitoring.
  - **2.2.** Provisions for notification of current Protection System and Special Protection System status or degradation that impacts System reliability.
  - **2.3.** A periodicity for providing data.
  - **2.4.** The deadline by which the respondent is to provide the indicated data.
- **M2.** Each Balancing Authority shall make available its dated, current, in force documented specification for data.
- **R3.** Each Transmission Operator shall distribute its data specification to entities that have data required by the Transmission Operator's Operational Planning Analyses, Real-time monitoring, and Real-time Assessment. [Violation Risk Factor: Low] [Time Horizon: Operations Planning]
- M3. Each Transmission Operator shall make available evidence that it has distributed its data specification to entities that have data required by the Transmission Operator's Operational Planning Analyses, Real-time monitoring, and Real-time Assessments. Such evidence could include but is not limited to web postings with an electronic notice of the posting, dated operator logs, voice recordings, postal receipts showing the recipient, date and contents, or e-mail records.
- **R4.** Each Balancing Authority shall distribute its data specification to entities that have data required by the Balancing Authority's analysis functions and Real-time monitoring. [Violation Risk Factor: Low] [Time Horizon: Operations Planning]
- **M4.** Each Balancing Authority shall make available evidence that it has distributed its data specification to entities that have data required by the Balancing Authority's analysis functions and Real-time monitoring. Such evidence could include but is not limited to web postings with an electronic notice of the posting, dated operator logs, voice recordings, postal receipts showing the recipient, or e-mail records.
- **R5.** Each Transmission Operator, Balancing Authority, Generator Owner, Generator Operator, Load-Serving Entity, Transmission Owner, and Distribution Provider receiving a data specification in Requirement R3 or R4 shall satisfy the obligations of the documented specifications using: [Violation Risk Factor: Medium] [Time Horizon: Operations Planning, Same-Day Operations, Real-time Operations]
  - **5.1.** A mutually agreeable format
  - **5.2.** A mutually agreeable process for resolving data conflicts
  - **5.3.** A mutually agreeable security protocol

**M5.** Each Transmission Operator, Balancing Authority, Generator Owner, Generator Operator, Load-Serving Entity, Transmission Owner, and Distribution Provider receiving a data specification in Requirement R3 or R4 shall make available evidence that it has satisfied the obligations of the documented specifications. Such evidence could include, but is not limited to, electronic or hard copies of data transmittals or attestations of receiving entities.

## C. Compliance

## 1. Compliance Monitoring Process

#### 1.1. Compliance Monitoring Process

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 Assessment Processes

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 responsible entity shall keep data or evidence to show compliance as identified below unless directed by its Compliance Enforcement Authority to retain specific evidence for a longer period of time as part of an investigation:

Each Transmission Operator shall retain its dated, current, in force, documented specification for the data necessary for it to perform its Operational Planning Analyses, Real-time monitoring, and Real-time Assessments in accordance with Requirement R1 and Measurement M1 as well as any documents in force since the last compliance audit.

Each Balancing Authority shall retain its dated, current, in force, documented specification for the data necessary for it to perform its analysis functions and Real-time monitoring in accordance with Requirement R2 and Measurement M2 as well as any documents in force since the last compliance audit.

Each Transmission Operator shall retain evidence for three calendar years that it has distributed its data specification to entities that have data required by the

Transmission Operator's Operational Planning Analyses, Real-time monitoring, and Real-time Assessments in accordance with Requirement R3 and Measurement M3.

Each Balancing Authority shall retain evidence for three calendar years that it has distributed its data specification to entities that have data required by the Balancing Authority's analysis functions and Real-time monitoring in accordance with Requirement R4 and Measurement M4.

Each Balancing Authority, Generator Owner, Generator Operator, Load-Serving Entity, Transmission Operator, Transmission Owner, and Distribution Provider receiving a data specification in Requirement R3 or R4 shall retain evidence for the most recent 90-calendar days that it has satisfied the obligations of the documented specifications in accordance with Requirement R5 and Measurement M5.

If a responsible entity is found non-compliant, it shall keep information related to the non-compliance until mitigation is complete and approved 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**

R #	Time Horizon	VRF	Violation Severity Levels			
			Lower VSL	Moderate VSL	High VSL	Severe VSL
R1	Operations Planning	Low	The Transmission Operator did not include one of the parts (Part 1.1 through Part 1.4) of the documented specification for the data necessary for it to perform its Operational Planning Analyses, Real-time monitoring, and Real- time Assessments.	The Transmission Operator did not include two of the parts (Part 1.1 through Part 1.4) of the documented specification for the data necessary for it to perform its Operational Planning Analyses, Real-time monitoring, and Real- time Assessments.	The Transmission Operator did not include three of the parts (Part 1.1 through Part 1.4) of the documented specification for the data necessary for it to perform its Operational Planning Analyses, Real-time monitoring, and Real- time Assessments.	The Transmission Operator did not include four of the parts (Part 1.1 through Part 1.4) of the documented specification for the data necessary for it to perform its Operational Planning Analyses, Real-time monitoring, and Real- time Assessments. OR, The Transmission Operator did not have a documented specification for the data necessary for it to perform its Operational Planning Analyses, Real-time monitoring, and Real- time Assessments.

R #	Time Horizon	VRF	RF Violation Severity Levels				
			Lower VSL	Moderate VSL	High VSL	Severe VSL	
R2	Operations Planning	Low	The Balancing Authority did not include one of the parts (Part 2.1 through Part 2.4) of the documented specification for the data necessary for it to perform its analysis functions and Real- time monitoring.	The Balancing Authority did not include two of the parts (Part 2.1 through Part 2.4) of the documented specification for the data necessary for it to perform its analysis functions and Real- time monitoring.	The Balancing Authority did not include three of the parts (Part 2.1 through Part 2.4) of the documented specification for the data necessary for it to perform its analysis functions and Real- time monitoring.	The Balancing Authority did not include four of the parts (Part 2.1 through Part 2.4) of the documented specification for the data necessary for it to perform its analysis functions and Real- time monitoring.  OR, The Balancing Authority did not have a documented specification for the data necessary for it to perform its analysis functions and Real- time monitoring.	
the left	For the Requirement R3 and R4 VSLs only, 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 of entity. If a small entity has just one affected reliability entity to inform, the intent is that that situation would be a Severe violation.						
R3	Operations Planning	Low	The Transmission Operator did not distribute its data	The Transmission Operator did not distribute its data	The Transmission Operator did not distribute its data	The Transmission Operator did not distribute its data	

R #	Time Horizon	VRF		Violation Se	verity Levels	y Levels	
			Lower VSL	Moderate VSL	High VSL	Severe VSL	
			specification to one entity, or 5% or less of the entities, whichever is greater, that have data required by the Transmission Operator's Operational Planning Analyses, Real-time monitoring, and Real-time Assessments.	specification to two entities, or more than 5% and less than or equal to10% of the reliability entities, whichever is greater, that have data required by the Transmission Operator's Operational Planning Analyses, Real-time monitoring, and Real-time Assessments.	specification to three entities, or more than 10% and less than or equal to 15% of the reliability entities, whichever is greater, that have data required by the Transmission Operator's Operational Planning Analyses, Real-time monitoring, and Real-time Assessments.	specification to four or more entities, or more than 15% of the entities that have data required by the Transmission Operator's Operational Planning Analyses, Real-time monitoring, and Real-time Assessments.	
R4	Operations Planning	Low	The Balancing Authority did not distribute its data specification to one entity, or 5% or less of the entities, whichever is greater, that have data required by the Balancing Authority's analysis functions and Real-time monitoring.	The Balancing Authority did not distribute its data specification to two entities, or more than 5% and less than or equal to 10% of the entities, whichever is greater, that have data required by the Balancing Authority's analysis functions and Real-time monitoring.	The Balancing Authority did not distribute its data specification to three entities, or more than 10% and less than or equal to 15% of the entities, whichever is greater, that have data required by the Balancing Authority's analysis functions and Real-time monitoring.	The Balancing Authority did not distribute its data specification to four or more entities, or more than 15% of the entities that have data required by the Balancing Authority's analysis functions and Real-time monitoring.	

R #	Time Horizon	VRF	Violation Severity Levels			
			Lower VSL	Moderate VSL	High VSL	Severe VSL
R5	Operations Planning, Same-Day Operations, Real-time Operations	Medium	The responsible entity receiving a data specification in Requirement R3 or R4 satisfied the obligations in the data specification but did not meet one of the criteria shown in Requirement R5 (Parts 5.1 – 5.3).	The responsible entity receiving a data specification in Requirement R3 or R4 satisfied the obligations in the data specification but did not meet two of the criteria shown in Requirement R5 (Parts 5.1 – 5.3).	The responsible entity receiving a data specification in Requirement R3 or R4 satisfied the obligations in the data specification but did not meet three of the criteria shown in Requirement R5 (Parts 5.1 – 5.3).	The responsible entity receiving a data specification in Requirement R3 or R4 did not satisfy the obligations of the documented specifications for data.

## **D. Regional Variances**

None.

## **E.** Interpretations

None.

## **F. Associated Documents**

None.

# **Version History**

Version	Date	Action	Change Tracking
0	April 1, 2005	Effective Date	New
0	August 8, 2005	Removed "Proposed" from Effective Date	Errata
1		Modified R1.2 Modified M1	Revised
		Replaced Levels of Non-compliance with the Feb 28, BOT approved Violation Severity Levels (VSLs)	
1	October 17, 2008	Adopted by NERC Board of Trustees	
1	March 17, 2011	Order issued by FERC approving TOP- 003-1 (approval effective 5/23/11)	
2	May 6, 2012	Revised under Project 2007-03	Revised
2	May 9, 2012	Adopted by Board of Trustees	Revised
3	April 2014	Changes pursuant to Project 2014-03	Revised
3	November 13, 2014 Adopted by Board of Trustees		Revisions under Project 2014-03

#### **Guidelines and Technical Basis**

#### Rationale:

During development of this standard, text boxes were embedded within the standard to explain the rationale for various parts of the standard. Upon BOT approval, the text from the rationale text boxes was moved to this section.

#### **Rationale for Definitions:**

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.

#### **Rationale for R1:**

Changes to proposed Requirement R1, Part 1.1 are in response to issues raised in NOPR paragraph 67 on the need for obtaining non-BES and external network data necessary for the Transmission Operator to fulfill its responsibilities.

Proposed Requirement R1, Part 1.2 is in response to NOPR paragraph 78 on relay data. The language has been moved from approved PRC-001-1.

Corresponding changes have been made to Requirement R2 for the Balancing Authority and to proposed IRO-010-2, Requirement R1 for the Reliability Coordinator.

#### Rationale for R5:

Proposed Requirement R5, Part 5.3 is in response to NOPR paragraph 92 where concerns were raised about data exchange through secured networks.

## **TOP/IRO Reliability Standards Definitions**



# **Definitions**

# Project 2014-03 Revisions to TOP/IRO Reliability Standards

As part of the work in Project 2014-03 Revisions to TOP/IRO Reliability Standards, the SDT is proposing changes to two existing definitions: Operational Planning Analysis and Real-time Assessment.

The currently-effective definition of Operational Planning Analysis is: "An analysis of the expected system conditions for the next day's operation. (That analysis may be performed either a day ahead or as much as 12 months ahead.) Expected system conditions include things such as load forecast(s), generation output levels, and known system constraints (transmission facility outages, generator outages, equipment limitations, etc.)."

The proposed version of the definition of Operational Planning Analysis is: "An evaluation of projected system conditions to assess anticipated (pre-Contingency) and potential (post-Contingency) conditions for next-day operations. The evaluation shall reflect applicable 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 third-party services.)"

The currently-effective definition of Real-time Assessment is: "An examination of existing and expected system conditions, conducted by collecting and reviewing immediately available data."

The proposed version of the definition of Real-time Assessment is: "An evaluation of system conditions using Real-time data to assess existing (pre-Contingency) and potential (post-Contingency) operating conditions. The assessment shall reflect applicable 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 third-party services.)"

The definitions were revised in response to issues raised in NOPR paragraphs 55, 73, and 74 on analysis and monitoring of SOLs in all time horizons, NOPR paragraph 70 (updating study results in Real-time), and NOPR paragraph 78 (Protection System coordination). The phase angle item was added in response to SW Outage Report recommendation 27.

The two definitions are also employed in the following proposed project standards: TOP-001-3, TOP-002-4, TOP-003-3, IRO-002-4, IRO-008-2, and IRO-010-2. These definitions are not used in any other standards, either currently-effective or in development in any other project.